



THE STAR

SUPPLIER CODE
OF CONDUCT

At The Star Entertainment Group, we are committed to ensuring that everything we do minimises the impact on the environment and the communities in which we operate. In order to achieve our goal of becoming Australia's leading integrated resort company, we must implement, maintain and develop sustainable strategies into our daily operations.



The Star Entertainment Group

In 2016, The Star Entertainment Group set out a new five-year sustainability strategy called 'Our Bright Future'.

Our view of sustainability is broad and focuses on building business capacity and delivering continuous improvement in the management of environmental, social and governance issues.

We acknowledge that we are on a journey to develop our position as a leading organisation in sustainability and corporate social responsibility. We realise that a key part of our sustainability journey, comes from you, our suppliers. Our commitment is to work collaboratively with our suppliers to ensure each and every one upholds the highest ethical, environmental, and social standards.

Our Supplier Code of Conduct establishes our expectations and seeks to align our commitments with that of our suppliers. Every supplier, contractor and sub-contractor across our properties is expected to work in line with this Code of Conduct.

We challenge you to innovate and look for opportunities to continuously improve your business practices. We welcome collaboration and partnership, and we ask our suppliers to present opportunities to enhance our sustainability performance, product selection and supply chain management.

'Our Bright Future' groups our objectives and targets into four key pillars:

1

We strive to be Australia's leading integrated resort company

2

We actively support guest wellbeing

3

We attract, develop and retain talented teams

4

We develop and operate world class properties



Sustainability Strategy

Our sustainability strategy is underpinned by a structured Materiality Assessment. This forms the principles that we as a business follow to maintain the highest standards of sustainability.

The sustainability strategy pillars are:

LEADING COMPANY

- Trusted community partners
- Ethical business

TALENTED TEAMS

- Developed team
- Fair and attractive employer

WORLD CLASS PROPERTIES

- Inviting and liveable precincts
- Sustainable and resilient resorts

GUEST WELLBEING

- Safe and secure guests
- Engaged guests

Human Rights, Labour Practices & Anti-Discrimination

Upholding human rights is fundamental to our business and underpins all that we do for our people, our guests, our partners and our communities. It is reflected through each of our values and is at the heart of our business. The Star Entertainment Group respects all human rights, as set out in the UN Declaration of Human Rights.

We expect that our suppliers will:

- Conduct their business activities in a manner that protects the fundamental human rights set out in the UN Declaration of Human Rights
- Support and respect the protection of internationally proclaimed human rights and make sure that they are not complicit in any human rights abuses
- Adhere to all local, national and international laws regarding human rights and modern slavery in the countries in which they operate
- Provide fair working conditions for all employees; including but not limited to, working hours, rest times, leave periods, etc.
- Under no circumstance engage in employment with any person who is not of the legal age to work, or who has been trafficked or forced into working
- Allow all workers, without distinction, the right to freedom of association and the effective recognition of the right to collective bargaining
- Proactively implement and develop policies and procedures that align to these expectations throughout their supply chain
- Cascade information throughout their business that ensures all employees, contractors, sub-contractors and suppliers are meeting these expectations

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Equal Employment Opportunity (EEO) & Supplier Diversity

At The Star Entertainment Group, we fully harness the unique opportunities in each property, to provide the most thrilling guest experiences in ways that truly reflect the unique character of our cities. Diversity and inclusion are key aspects of our strategy and the way in which we choose to conduct our business.

Our commitment to Diversity and Inclusion is further demonstrated through our organisational targets set out below:

- LGBTQI - inclusive employer as measured by our increasing scores on the Australian Workplace Equality Index (AWEI)
- 50% female representation of leaders by 2020
- 20% Asian representation of leaders by 2020
- A welcoming culture for our mature aged employees as measured by our employee engagement survey

We expect that our suppliers will:

- Respect all employees regardless of gender, age, race, sexual orientation and gender identity
- Actively work to eliminate discrimination in respect of employment and occupation
- Adhere to all local and national laws covering equal employment opportunity and anti-discrimination
- Employ staff fairly based on merit and ability to do the job, and do not discriminate based on personal characteristics such as physical attributes, gender, age, race, sexual orientation, etc.
- Ensure that all staff are able to work free from discrimination, bullying and sexual harassment

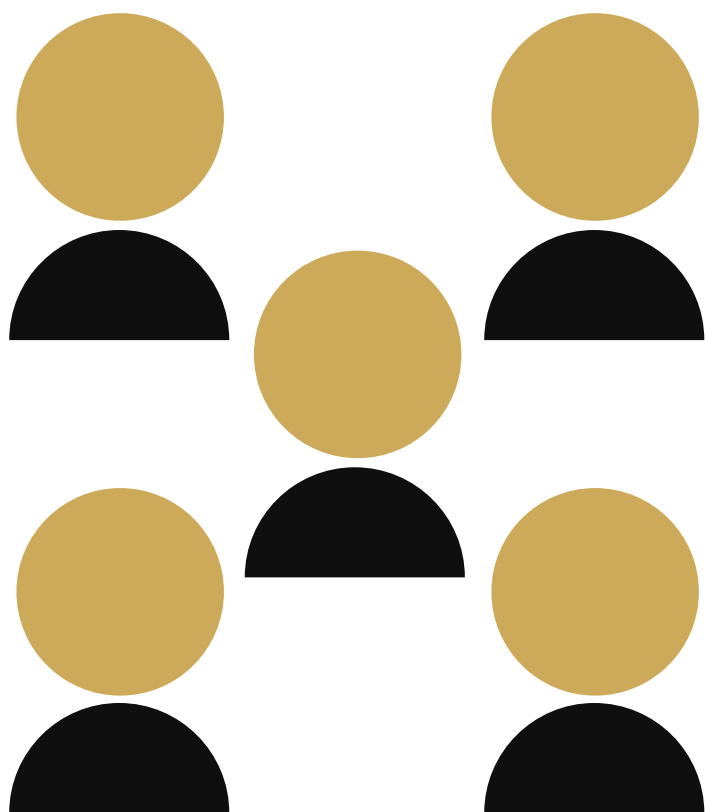
We actively look to engage suppliers who are owned by or provide training and employment to disadvantaged groups, including but not limited to, Aboriginal and Torres Strait Islanders and Disability Enterprises, and we encourage our suppliers to do likewise.

Community Involvement

The Star Entertainment Group aims to deliver thrilling experiences for our guests. In doing so, we support and participate in the communities in which we operate and in the events that resonate in those cities.

Partnerships with charities, community groups and sporting organisations extend our commitment to responsible corporate citizenship beyond the provision of safe and compliant entertainment venues.

We challenge our suppliers to give back to local communities and implement philanthropic practices within their organisation and we look to partner with suppliers who implement these practices.



Environmental

The Star Entertainment Group understands its environmental management responsibilities and is committed to achieving environmental excellence across all its operations. We manage our business activities in a manner that seeks to minimise adverse environmental impacts and delivers continual improvement in environmental performance.

As part of our commitment to reducing our environmental impact, we've set organisational sustainability targets in alignment with the 'Our Bright Future' strategy. The targets show a commitment to achieving improved sustainability outcomes and operating as a world class property.

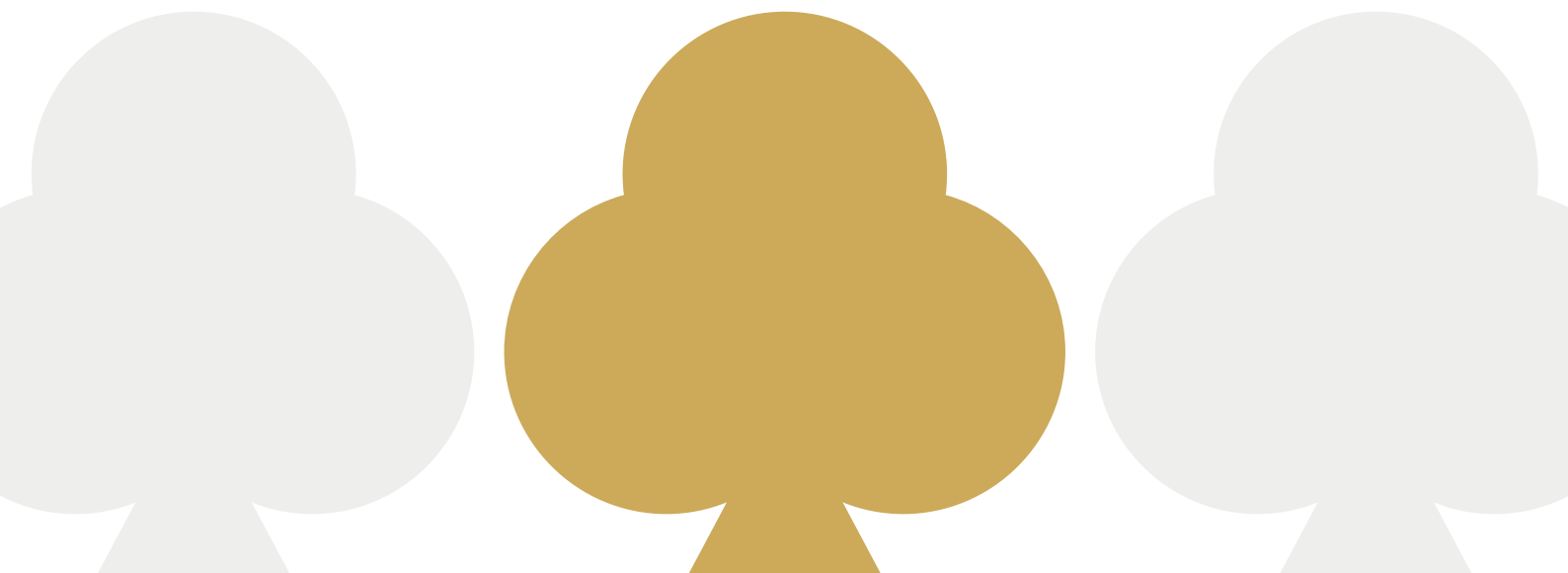
The resource targets cover a 10-year time frame, are at an organisational level and are as follows:

- 30% reduction in carbon emission intensity by FY23, based on a FY13 baseline year (per m²)
- 30% reduction in potable water consumption intensity by FY23, based on a FY13 baseline year (per m²)

We expect that our suppliers will:

- Identify, control, and where possible, minimise adverse environmental impacts arising from its operations, products or services
- Notify The Star Entertainment Group of any opportunities to better manage resource consumption;
- Meet or exceed all relevant legal obligations and relevant codes of practice
- Prevent pollution, minimise waste and improve resource use efficiency
- Progressively assess their energy consumption to identify opportunities for improving the energy efficiency of its operations
- Communicate openly with the community, government and other stakeholders regarding their environmental performance

For more information regarding our environmental commitments and expectations, please refer to our Sustainable Design and Operational Standards.



Workplace Health & Safety

At the forefront of operating a world class property is safety; for our guests, our employees and the communities in which we operate. The Star Entertainment Group is committed to building a prevention culture that contributes positively to a safe and healthy work environment.

We understand as a business that this commitment extends to both physical safety and mental health and wellbeing.

We expect that our suppliers will:

- Comply with health and safety legislation and other requirements placed upon the business
- Establish measurable health and safety objectives and targets
- Establish, implement and maintain a health and safety management system that is regularly monitored and reviewed for effectiveness
- Provide and maintain health and safety information, instruction, training or supervision where required
- Ensure incidents are responded to, and appropriately investigated in a timely and effective manner
- Enable leaders to visibly demonstrate their commitment to health and safety and accept accountability for their actions



The Star Entertainment Group is committed to building a prevention culture that contributes positively to a safe and healthy work environment.

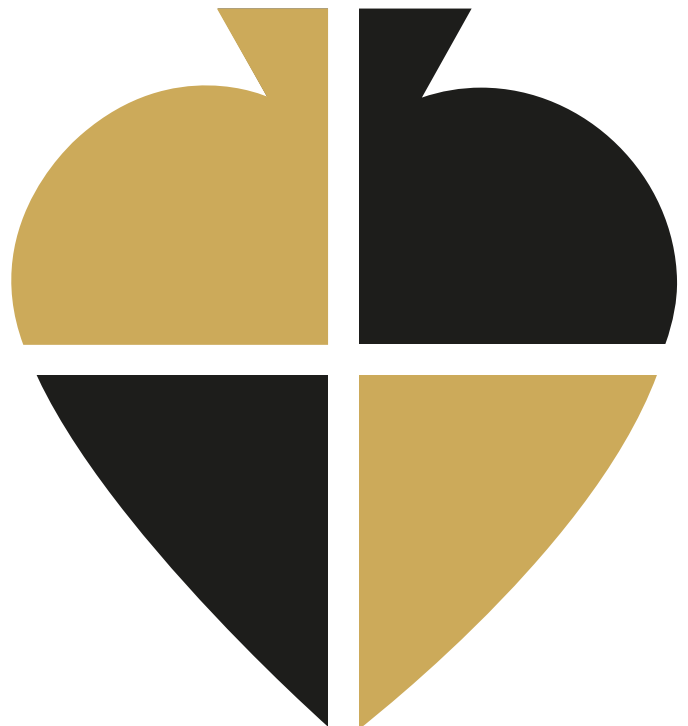
Anti-Corruption

The Star Entertainment Group believes that integrity and fair dealing are essential assets of our company and this should be reflected in all activities. Corruption in any form undermines the integrity of all involved and damages the fabric of the organisations to which they belong.

We expect that all suppliers will:

- Work against corruption in all its forms, including extortion and bribery
- Comply with all applicable laws and regulations pertaining to corruption, bribery and other prohibited business practices
- Proactively develop adequate policies and procedures to prevent bribery in all commercial dealings
- Foster a culture of transparency that allows all stakeholders to speak out about corruption in all forms

Further to this, all of The Star Entertainment Group's employees act in accordance with a Gifts Policy that promotes a culture of acting honestly and with integrity. Employees and suppliers must ensure that any gift does not compromise, and would not objectively be viewed as compromising, the employee's independence and judgment in connection with any decision affecting our business relationship with the giver of the gift.



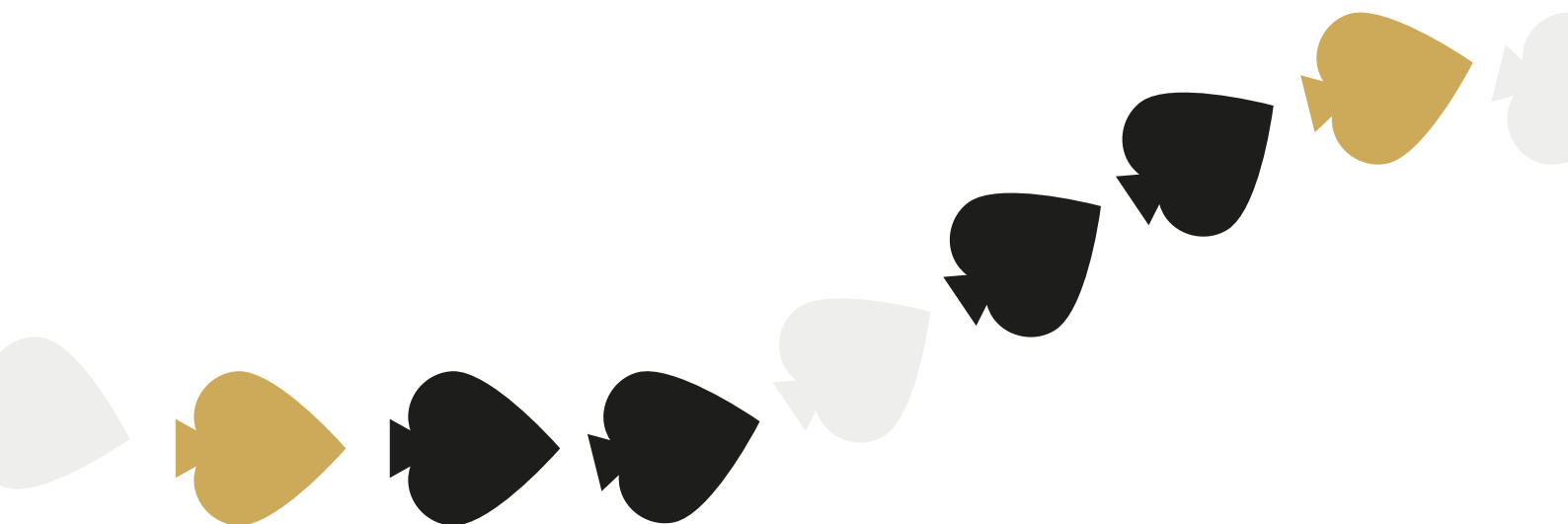
Supply Chain Management

The Star Entertainment Group recognises that its responsibility for sustainable procurement extends to the management of our supply chain.

We are committed to working together with our suppliers to comply with this Code of Conduct, and in turn expect these expectations to be cascaded through our supply chain.

We expect that our suppliers will:

- Ensure that this Code of Conduct is communicated to all suppliers within their supply chain
- Hold their suppliers to the expectations set forth in this Code of Conduct
- Proactively and collaboratively work with their suppliers to improve their performance and bring them to work in line with this Code of Conduct



Privacy (How we treat information)

The Star Entertainment Group prides itself on the ability to protect the integrity of confidential business and guest data which is collected, used, stored, and disposed of in the course of business operations.

We have a dedicated IT security function which continuously tests and monitors our technology systems to detect and block viruses and other threats to the security of our data.

Furthermore, our employees are regularly trained on the importance of maintaining effective cyber security and data privacy processes.

We expect that our suppliers will:

- Protect our privacy rights by making sure that our personal information is properly collected, stored, used and disposed
- Provide training for all employees on the importance of privacy and how to conform with privacy laws
- Refrain from disclosing any information which is confidential in its nature to anyone apart from its intended recipient

For further information regarding how we treat your information, please refer to our Privacy Policy.



Raising a concern

The Star Entertainment Group is committed to delivering a culture of honesty and integrity. Our integrity underpins our reputation for honesty and fair and responsible business practices.

We maintain a service known as The Star Entertainment Group Integrity Protection Service (E-TIPS). E-TIPS is an independent, anonymous and confidential crime and misconduct reporting service.

Corporate ethics, whistle-blower and investigations specialists, Etika Pty Ltd, provides us with services to support E-TIPS. As an external and independent service provider, Etika confidentially and securely receives all reports and directs them to the appropriate contact in The Star Entertainment Group for assessment and investigation. E-TIPS helps to protect and enhance our integrity, continually improve our compliance culture and ensure our directors, people and businesses act lawfully and responsibly.

Etika can be contacted if there is any suspected misconduct using the following methods:

- Telephone (a free call within Australia):
1800 499 114
- Email: etips@etika.com.au





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