



Political Donations Policy

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GENERAL INFORMATION

Purpose

This policy sets out the framework, principles and guidelines relating to political donations by The Star Entertainment Group Limited, and/or its subsidiary companies (The Star).

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; and
- Temporary employees.

DETAILED INFORMATION

Background

The Star aims to be fully compliant with legislative requirements relating to political donations.

Current laws prohibit The Star from making political donations at a state level in both NSW and Queensland. Both states have laws which ban political donations from property developers and industry bodies which have property developers as the majority of their members. It is also against the law to ask someone to make a donation on behalf of a prohibited donor.

Federally, The Star is able to make donations as per the guidelines set out by the Australian Electoral Commission.

Scope

The scope of this policy is limited to Australian federal political parties and candidates.

Objectives

The Star does not make cash donations to political parties or to any individual seeking election to public office. Most of The Star's donations (including hospitality, defined as a 'gift-in-kind') are to attend events, purchase seats, attend political briefings, to use corporate hospitality to showcase our facilities, and to promote engagement with industry, political stakeholders and regulators.

The Star aims to be bi-partisan in its approach to donations between the major parties.

The Star's political donations are publicly available on the Australia Electoral Commission website, as per annual reporting requirements, with supporting disclosure signed by the Group Chief Financial Officer.

The Board People, Culture and Social Responsibility Committee has responsibility for overseeing any political activities or donations made by the organisation.

Policy

All requests for, or proposed donations to, political parties (including gifts-in-kind and fundraising) are to be referred to any one of the following members of management for consideration and approval:

- o Head of External Affairs NSW
- o Head of External Affairs QLD
- o Group Executive External Affairs

The external affairs team will set a FY budget for donations in direct consultation with the Managing Director/CEO. Throughout the year, any single proposed donation of/exceeding \$10,000 is to be referred to the Managing Director/CEO for approval.

The external affairs team is to maintain an annual spreadsheet of donations on a shared Group document, to be reviewed monthly by the team and monitored for bipartisan spend. This includes spend via purchase orders and by corporate credit cards held by the External Affairs team.

A summary of YTD political donations is to be provided to each quarterly meeting of the People, Culture and Social Responsibility Committee meeting. During politically sensitive periods (eg federal elections), additional reporting and/or context is to be provided to the PCSR Committee and Exco to advise of proposed and/or increased activities.

Annual returns for each financial year must disclose details of donations:

- including gifts-in-kind, made to registered political parties or political campaigners totalling more than the annual AEC disclosure threshold; and
- of more than the disclosure threshold received and used (wholly or partly) to make the donations disclosed in the return.

Policy Application and Assurance

On an annual basis, and prior to disclosure to the Australian Electoral Commission, the Group spreadsheet of political donations is to be reconciled with all political transactions within the general Group Finance ledger. External Affairs is to work with its Group Finance Partner to undertake a reconciliation to include GL codes as well as a key word search for potential political donations, to ensure 100% capture in the event of incorrect coding.

Review

The level of political donation spend is to be revisited between External Relations team and Managing Director/CEO each year.