



The Star Entertainment Group

CONFLICT OF INTEREST POLICY

Original issue date: 1 March 2018

Reissue date: 29 June 2021

Effective date of this version: 29 June 2021

Approved by: Board of Directors

Version number: 2.1

CONTENTS

1. PURPOSE3

2. SCOPE.....3

3. WHAT IS A CONFLICT OF INTEREST?.....3

4. POLICY REQUIREMENTS.....4

4.1 All Employees4

4.2 Employment Conflicts.....4

4.3 Travel & Accommodation4

4.4 Hospitality4

4.5 Suppliers or Potential Suppliers who Regularly Engage in Gaming4

5. ACCOUNTABILITY5

5.1 All Employees5

5.2 The Star Leaders5

5.3 PCSR Committee.....5

5.4 The Ethics Panel5

5.5 Group Risk5

6. REPORTING BREACHES OF THE POLICY6

7. DEALING WITH BREACHES OF THE POLICY.....6

8. ADMINISTRATION OF THE POLICY.....6

9. RELATED AND SUPPORTING POLICIES6

APPENDIX A - THE STAR VALUES8

APPENDIX B – ETHICS PANEL CONTACT INFORMATION.....9

1. PURPOSE

In accordance with the Code of Conduct guiding principles, The Star Entertainment Group (**The Star**) is committed to conducting business in a manner which is ethical, professional and compliant with the law.

It is expected that our employees will always act in accordance with The Star Values (**Appendix A**) and in the best interests of The Star. Our employees are expected to use The Code Guiding Principles as the framework to deliver The Star Values.

Conflicts of interest have the potential to compromise The Star's achievement of this commitment.

This Conflicts of Interest Policy (**Policy**) explains what conflicts of interest are and the processes to be followed to declare, manage and report conflicts of interest.

2. SCOPE

This Policy articulates the standards expected of everyone who performs work for and on behalf of The Star inclusive of all Directors, employees, contractors and labour hire firms (**Employees**).

A breach of this Policy may be regarded as a breach of The Star's Code of Conduct. A breach of this Policy and/or the Code of Conduct may result in disciplinary action which may include termination of employment with The Star.

3. WHAT IS A CONFLICT OF INTEREST?

A conflict of interest occurs when the potential or reality of personal gain influences a decision or action taken which is not in the company's best interests.

The appearance or perception of a conflict of interest can be as important as an actual conflict of interest.

There is the potential for a conflict of interest whenever there is any type of personal interest. A personal interest generally causes a conflict of interest when business objectives, performance or decision-making is compromised because of, or is at odds with, the personal interest.

A conflict of interest can arise where a decision may be made based on a personal relationship or the potential for personal gain. A perceived conflict of interest arises when a personal relationship could be seen as having the potential to affect a decision regardless of whether that relationship actually has any bearing on the decision.

Conflicts of interest can arise in, but are not limited to, the following business dealings:

- providing service to guests
- purchasing and awarding supply or service contracts
- selection and recruitment of Employees
- Employee transfer and promotion decisions
- Employee shift rostering decisions
- training and development opportunities with suppliers or business partners
- remuneration review process
- Employee performance management
- handling grievances and incident investigations
- decisions relating to disciplinary action against or dismissal of an Employee
- auditing and surveillance
- running a business or working in a second job which might compete with aspects of The Star's business or which could compromise an employee's ability to fully discharge their duties as an Employee of The Star.

The potential for, or presence of, a conflict of interest does not indicate wrongdoing. However, failure to adequately manage conflicts of interest can damage The Star's reputation.

4. POLICY REQUIREMENTS

4.1 All Employees

All Employees are expected to:

- act in the interests of The Star and apply their skill, labour and time in a manner that is not in conflict with the company's best interests
- notify his/her immediate supervisor of any circumstance where the Employee has a personal interest in a matter that is, has the potential to be, or may reasonably be perceived by a third person as being, in conflict with The Star's best interests.

An Employee with an actual or perceived conflict of interest must, to the maximum extent possible, be excluded from any decision making in relation to the matter which gives rise to the conflict of interest.

All reports of and decisions related to actual, potential or perceived conflicts of interest must be documented in the Conflict Register by the person disclosing the interest and/ by the person making any decision in relation to that conflict of interest.

An Employee who is unsure if they are involved in situations that involve a conflict of interest should contact Group Risk (compliance@star.com.au) with details of the potential conflict for assessment and advice.

4.2 Employment Conflicts

An employment conflict of interest arises where two Employees are in a familial or intimate personal relationship and their work roles places one of them in a direct or indirect supervisory position relative to the other.

In this circumstance, both Employees must immediately notify the Chief People & Performance Officer of the existence of the personal relationship and comply with directions given to them to effectively manage the conflict of interest.

4.3 Travel & Accommodation

Travel and accommodation associated with conferences, trade events, hospitality events or business-related meetings must be paid for by The Star.

Travel or accommodation provided by current or potential suppliers of goods or services to The Star is generally **not** considered to be acceptable. However, the Ethics Panel may authorise an Employee to accept travel or accommodation in special circumstances.

4.4 Hospitality

Hospitality provided to an Employee by current or potential suppliers should always be considered in the context of potential conflicts of interest.

As a general rule, acceptance by an Employee of hospitality of a modest nature which is associated with the core function of the Employee's position and for the purposes of business development would generally not be considered as creating a conflict of interest. However, an Employee in receipt of hospitality must comply with The Star's Gifts Policy, including the requirement to make a report in the Gift Register.

Any hospitality extended to a third person by an Employee as part of the Employee's business function should be of a reasonable nature.

4.5 Suppliers or Potential Suppliers who Regularly Engage in Gaming

Managers with a delegated authority in accordance with the Delegated Authorities Policy may find themselves in a position to approve the supply of goods or services from suppliers who may be regular customers of The Star gaming offerings.

In any instance where it may appear that by engaging a supplier under a delegated authority The Star or the delegate may be exposed to a conflict of interest, the person making the decision will notify the Ethics Panel of the circumstances of the potential conflict. Any decision to engage or continue to engage a supplier who regularly participates in The Star gaming offerings must be made under the guidance of the Ethics Panel with appropriate discussion and documentation of the decision-making process.

5. ACCOUNTABILITY

5.1 All Employees

All Employees are responsible for:

- notifying their manager or leader of any potential conflict of interest.

5.2 The Star Leaders

The Star Leaders are responsible for:

- promoting compliance with this Policy, including taking reasonable steps to ascertain whether Employees who report to them may have an actual or perceived conflict of interest that should be documented in the Conflict Register
- complying with advice and guidance in relation to managing conflicts of interest.

5.3 The Star Board

The Star Board is responsible for approving this Policy and amendments to this Policy.

5.4 PCSR Committee

The PCSR Committee is responsible for:

- reviewing any changes to the Policy proposed by the Ethics Panel and recommending amendments to this policy for consideration by the Board
- reviewing the effectiveness of the Policy in identifying, managing and reporting conflicts of interest.

5.5 The Ethics Panel

The Ethics Panel is responsible for:

- investigating reports of breaches of the Policy
- reporting to the PCSR Committee details of breaches of the Policy
- reviewing the effectiveness of this Policy and recommending any changes to the People, Culture and Social Responsibility Committee of the Board no less frequently than every three years
- putting in place procedures for dissemination of, and monitoring compliance with, this Policy.

5.6 Group Risk

Group Risk is responsible for:

- establishing and maintaining the Conflict Register
- providing advice and guidance in relation to the identification, management and reporting of conflicts of interest.

6. REPORTING BREACHES OF THE POLICY

Any breach of this Policy is Reportable Conduct as defined in The Star's Whistleblower Policy.

You must make a report of any behaviour which you become aware of and which you consider may be Reportable Conduct. The report may be made to any of the following:

- your immediate leader, a manager or other senior manager within the area where you work
- the Group Investigations Manager
- any member of the Ethics Panel (Appendix B); or
- email callitout@star.com.au
- through The Star's secure whistle-blower service e-TIPS.

EMAIL etips@etika.com.au **TELEPHONE** 1800 499 114 a free call within Australia

7. DEALING WITH BREACHES OF THE POLICY

The Ethics Panel is responsible for investigating breaches of this Policy.

A breach of this Policy may be regarded as also breaching The Star's Code of Conduct, depending on the circumstances in which the breach occurred. A breach of this Policy and/or the Code of Conduct may result in disciplinary action which may include termination of employment with The Star.

Where it is difficult to determine the actions needed to be taken in instances of actual or perceived conflicts of interest, the matter will be presented to the Ethics Panel who will be responsible for providing definitive advice on the handling of the conflict.

8. ADMINISTRATION OF THE POLICY

The Ethics Panel is responsible for administration of this Policy.

Contact details for members of the Ethics Panel are set out in **Appendix B**.

The Ethics Panel will review this Policy no less frequently than every three years to check that it is operating effectively and recommend to the People, Culture and Social Responsibility Committee any changes it thinks are necessary.

Any changes to this Policy must be approved by the Board.

9. RELATED AND SUPPORTING POLICIES

This Policy is supported by other The Star policies including (but not limited to):

- Code of Conduct
- Whistleblower Policy
- Gifts Policy
- Procurement Policy
- Delegated Authorities Policy

10. GLOSSARY

Conflict Register means the system in which all reports of conflict of interest are documented.

Direct supervisory relationship is a relationship where a person's primary role includes responsibility for an employee's performance management, or any benefit or entitlement associated with the employee's role.

Ethics Panel means the Ethics Panel established under The Star's Code of Conduct. Details of the members of the Ethics Panel are set out in **Appendix B**.

Hospitality means food, drink, admission tickets, accommodation and/or travel provided in connection with events such as cocktail parties, social functions, sporting, theatrical or other events.

Indirect supervisory relationship is a relationship where a person's primary role has the capacity to influence an employee's manager in the employee's performance management or any benefit or entitlement associated with the employee's role.

PCSR Committee means the People, Culture and Social Responsibility Committee of the Board.

Supplier means any individual, company or other entity which provides, has provided, or is seeking to provide, goods and services to The Star and includes the officers and employees of any such supplier.

APPENDIX A - THE STAR VALUES

The Star Values are:

- Ownership
- True Teamwork
- Welcoming
- Do the Right Thing

	Code of Conduct Guiding Principle	The Star Values
1	We Respect the Community We are a good corporate citizen and conduct our business in a manner that respects the community, protects the environment and seeks to prevent anti-social behaviour and illegal or undesirable activity (IUA) on, or in the vicinity of, the properties we operate.	Do the Right Thing, Welcoming
2	We are Diverse We provide an inclusive environment in which everyone is treated fairly and with respect. Our policies, procedures, work conditions and practices are designed to combat direct and indirect discrimination.	Do the Right Thing, Welcoming
3	We Comply with the Law We comply with our legal and regulatory obligations, voluntary commitments, industry standards and company policies and procedures. In doing so, we protect the interests of the company, the community, our guests and our employees.	Ownership, Do the Right Thing, True Teamwork
4	We are Ethical We conduct our business with honesty and integrity as this is the basis for maintaining our reputation.	Ownership, Do the Right Thing, True Teamwork
5	We are Professional We take ownership of our actions and aim for excellence in everything we do.	Do the Right Thing, Welcoming, Ownership, True Teamwork
6	We Work Safely We keep our properties healthy, safe and secure so our employees can return home safely at the end of each working day and our guests can enjoy their time with us.	Do the Right Thing, Ownership, True Teamwork

APPENDIX B – ETHICS PANEL CONTACT INFORMATION

Position	Name	Phone Number	Email Address
Independent Consultant	Susan Cunningham	1800 499 114	etips@etika.com.au
Group Investigations Manager	Kevin Houlihan	(02) 9657 9783	Kevin.Houlihan@star.com.au
Chief People and Performance Officer	Kim Lee	(02) 9657 8515	Kim.Lee@star.com.au
Chief Legal and Risk Officer	Paula Martin	(07) 3228 0014	PM.Martin@star.com.au
General Manager Social Responsibility	Micheil Brodie	(02) 9657 7910	Micheil.Brodie@star.com.au
Group General Counsel	Andrew Power	(02) 9657 8751	Andrew.Power@star.com.au
Chief Operating Officer	Jess Mellor	0428 075 736	Jessica.mellor@star.com.au