



The Star Entertainment Group

CODE OF CONDUCT

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FOREWORD

The Star Entertainment Group Limited (**The Star**) stands for high quality, local experiences. Our commitment is to create memorable experiences for all our guests. We have a world class product of which you can all be proud.

We are a respected part of the economic and social fabric of the communities in which we operate. We have achieved this by investing in superior facilities and talented people and by being ethical and professional in all that we do.

This hard-earned reputation is a result of a focused effort to establish and maintain the principles and behaviours described in this Code. The careless or improper actions of just one employee can seriously damage our reputation as a good corporate citizen.

Our Code of Conduct Guiding Principles are designed to give clear direction to enable us all to make decisions in line with what is expected by The Star, especially in those situations where the right choice is not easy or obvious.

Every employee must comply with all applicable laws while working for The Star. The Star will forgo any business dealing that relies on a violation of the law of any country. No person in the company is authorised to give any instruction to the contrary.

This Code is supported by a consistent set of policies, procedures and guidelines designed to empower all employees to make informed decisions every day.

We encourage all employees to feel confident to report any unlawful activity, corruption, theft, fraud, or wilful breaches of this Code. No employee will be disadvantaged in any way because they acted in good faith to report a potential violation of the Code.

We all have an important role to play in maintaining a positive and professional workplace culture, one which evokes pride and loyalty from all our stakeholders.

Please take the time to read and understand the Code and make a personal commitment to implement it in all areas of your work.

1. PURPOSE

The Star Entertainment Group (**The Star**) adheres to high ethical and legal standards. The purpose of this Code of Conduct (**Code**) is to articulate the behaviours expected of our employees in the course of performing their duties of employment. It sets out the guiding principles which shape the way decisions should be made and how we perform our duties in the best interests of The Star. By adhering to these principles, we build trust and confidence among our stakeholders – which include our guests, our business partners, regulatory authorities, local communities and, importantly, our fellow team members.

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.

The Code has been approved by The Star's Board of Directors.

2. SCOPE

This Code applies to everyone who performs work for and on behalf of The Star inclusive of all Directors, employees, contractors and labour hire firms (**employees**).

3. THE CODE GUIDING PRINCIPLES

The **Code guiding principles** describe the core elements of the behavioural standard The Star has set for itself and the behaviours expected by The Star of its employees. The Code guiding principles are as follows:

1. **We Respect the Community**
2. **We Are Diverse**
3. **We Comply with the Law**
4. **We are Ethical**
5. **We are Professional**
6. **We Work Safely**

4. THE CODE

4.1 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.

The Star will respect the community by:

- maintaining and promoting a Responsible Service of Alcohol (**RSA**) program
- maintaining and promoting a Responsible Gaming (**RG**) program
- maintaining and promoting a Corporate Responsibility program.

Our employees will respect the community by:

- serving alcohol responsibly in compliance with The Star's RSA program
- providing a responsible service of gaming in compliance with The Star's RG program
- maintaining (where appropriate) an RSA licence

- reporting all incidents affecting the health, safety or security of The Star's guests, employees, and assets.

4.2 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.

The Star encourages diversity by:

- developing strategies, initiatives and programs to promote diversity
- engaging with the community in projects supportive of diversity
- establishing measurable diversity objectives and reporting progress toward achievement of those objectives.

Our employees demonstrate diversity by:

- behaving in a manner that is inclusive and welcoming
- respecting the diverse cultural, social and religious beliefs and backgrounds of the community, our guests and our fellow The Star employees
- speaking out when actions or behaviours of guests or fellow The Star employees are offensive, abusive or disrespectful
- complying with relevant The Star policies including policies relating to equal employment opportunity, discrimination, harassment and workplace bullying.

4.3 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.

The Star will help our employees comply with the law by:

- providing all employees with training appropriate to their role
- making readily available to employees all appropriate rules, policies and procedures
- maintaining procedures to identify and communicate material changes to legal and regulatory obligations, voluntary commitments, industry standards or company policies and procedures which may affect employees
- maintaining all licences required for the operation of the business.

Our employees will comply with the law by:

- understanding the legal obligations specific to their job role
- observing all laws, regulations and standards governing the jurisdictions in which we operate
- following the policies, procedures and processes designed in support of our legal obligations
- immediately reporting any suspicion of unlawful actions
- reporting breaches of policies, laws, rules and standards
- maintaining all required licences for the conduct of duties
- reporting illegal and undesirable activities including but not limited to money laundering, lending, loan sharking, the taking, dealing or possession of drugs and prostitution

- reporting in accordance with Anti-Money Laundering and Counter Terrorism Funding practices (AML-CTF).

4.4 We are Ethical

We conduct our business with honesty and integrity as this is the basis for maintaining our reputation.

The Star will demonstrate ethical behaviour by:

- Maintaining a system of policies and procedures that respect human rights, the environment, and sustainable practices
- honouring our contractual obligations
- dealing fairly with our employees, our guests, and our suppliers
- having in place a Code of Conduct and other appropriate policies and procedures so employees know what is expected of them
- providing effective leadership and segregation of duties to prevent fraud and other dishonest behaviour
- maintaining a Whistleblower Policy and providing an independent avenue for the reporting of suspected unethical or illegal dealings
- conducting our business in a manner compliant with all applicable laws.

Our employees are expected to:

- act in accordance with The Star Values (**Appendix A**)
- act honestly and with high standards of personal integrity
- use The Star property only in the context of work and not for personal gain or to the detriment of The Star or its guests
- act in a manner that does not take advantage of their position or the opportunities arising from that position for personal gain
- safeguard The Star's assets, including physical assets and intellectual property rights
- seek management approval before engaging in activities which may be perceived as creating a conflict of interest
- disclose all conflicts of interest
- not engage in activities which gain or attempt to gain advantage through deception, theft, or collusion
- refrain from behaviours which could bring The Star into disrepute
- only accept tips or gifts if permitted by our role and report these in accordance with The Star's policies on tips and gifts
- challenge and report unethical behaviours or practises
- assist investigations into potentially unlawful events as required
- provide complete, honest and accurate information to any regulator who lawfully requests information.

4.5 We are Professional

We take ownership of our actions and aim for excellence in everything we do.

The Star will show professionalism by:

- treating all The Star employees with respect
- promoting collaborative and collegial workplaces
- providing secure locations for the storage of confidential information
- providing training and development opportunities for The Star employees to improve skills and pathways for career development.

Our employees are professional when they:

- work within the requirements of their employment contract and follow all lawful and reasonable directives that are within their capability and training
- maintain and improve the skills necessary for the proper performance of their job roles, including timely completion of all mandatory training requirements
- are polite and respectful in their dealings with other people – including guests, suppliers, fellow employees and regulatory authorities
- use social media responsibly and legally and in accordance with The Star's policies
- make decisions within the scope of their delegated authority
- immediately inform The Star if they are arrested, charged or convicted of any offence that could be relevant to their employment or licence
- are not in possession of or affected by illegal drugs or illicit substances while on The Star premises
- work consistently within The Star service standards, policies and procedures
- work in a manner that is supportive of guests engaging safely in gaming activities
- conduct themselves in a manner which is fair and inclusive.

4.6 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.

The Star will keep its employees and guests safe by:

- providing safe and inclusive workplaces
- implementing a risk management framework relating to safe work practises so that safety issues can be promptly identified, assessed and managed
- provide employees with training, instruction and information about safe working practices
- providing programs to promote the health and wellbeing of employees and guests.

Our employees are expected to keep themselves and others safe by:

- following safe work procedures
- immediately reporting unsafe work practises
- immediately reporting unsafe areas, equipment or hazards
- using appropriate safety equipment in carrying out the duties of employment
- complying with all reasonable directives relating to the safety of guests and employees

- understanding their individual responsibility for working safely
- using legal substances, or medicines, in the manner in which they are prescribed and refraining from working under the influence of legal substances or medication when doing so would be unsafe
- undertaking their duties free from the influence of alcohol or other intoxicants.

5. COMPLYING WITH THE CODE

5.1 Reporting Breaches of the Code

Each of us has a responsibility to comply with the Code. A breach of this Policy may result in disciplinary action which may include termination of employment with The Star.

Each of us also has a responsibility to report actual or suspected breaches of the Code.

If you become aware of, or have reason to suspect that, an employee has, or may have, breached the Code by engaging in any misconduct, or illegal or undesirable activities, or otherwise acting contrary to the requirements of the Code, you should report the matter as follows:

- Report the matter to your immediate leader
- If the matter to be reported concerns your immediate leader, or if you are not satisfied that your immediate leader would treat your concerns with appropriate seriousness, report the matter to your People & Performance team or to the Executive General Manager of the business area you work in
- Report the matter to any member of The Star's Ethics Panel (**Appendix B**)
- email callitout@star.com.au
- Report the matter through The Star's secure whistle-blower service e-TIPS.

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

You can also contact the Investigations Department to make a report by telephone or email. The Investigations Department treats all matters with as much confidentiality as is possible although The Star may have a legal obligation to disclose the information (eg to law enforcement agencies) in certain circumstances.

5.2 Co-operating with Investigations

The Investigations Department may request that you participate in an interview if they consider that you may have information relevant to a matter being investigated. Employees are required to participate in, and to co-operate fully during, such interviews including providing full disclosure of any information relevant to the investigation. Employees are also required to comply with all other reasonable requests relevant to the investigation, including making available devices or files on which information may be stored and providing access to areas where the Investigations Department reasonably consider that relevant information, devices or files may be stored.

Employees are not entitled to bring a representative or witness to interviews with the Investigations Department.

At the conclusion of an investigation, the Investigations Department may provide relevant information to The Star's People & Performance team for consideration of any further action that may be appropriate including (but not limited to) conducting its own additional enquiries, interviewing relevant employees, and determining any disciplinary action that may be required in the circumstances.

6. ADMINISTRATION OF THE CODE

The Ethics Panel is responsible for administration of this Code.

Details of the members of the Ethics Panel are set out in **Appendix B**.

In administering this Code, the Ethics Panel are responsible for:

- Reviewing the effectiveness of the Code and recommending any changes to the People, Culture and Social Responsibility Committee of the Board
- Putting in place procedures for dissemination of, and monitoring compliance with, the Code
- Investigating alleged breaches of the Code and
- Reporting breaches of the Code to the People, Culture and Social Responsibility Committee.

The Ethics Panel will review this Code no less frequently than every two years to check that it is operating effectively and recommend to the People, Culture and Social Responsibility Committee any changes it thinks are necessary to promote a workplace culture consistent with the objectives of the Code.

Changes to the Code must be approved by the Board.

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