



THE STAR

The Star Entertainment Group

GIFTS POLICY

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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.

This Gifts Policy (**Policy**) supports the Code of Conduct by setting out what Employees should do if they receive, or are offered, a gift in connection with performing their duties of employment. It has been approved by the People, Culture and Social Responsibility Committee (**PCSR Committee**) of the Board.

2. SCOPE

This Policy applies to every person who performs work for or on behalf of The Star Entertainment Group (**The Star**) including directors, permanent, part-time and casual employees, contractors and workers under labour hire arrangements (**Employees**).

The Policy applies in respect of gifts offered or given **to** an Employee from a person (other than a fellow Employee) in connection with the Employee's work at The Star.

This Policy does **not** apply to gifts **from** an Employee to a person (other than a fellow Employee) in connection with the duties of employment. Gifts given in these circumstances must comply with The Star's Anti-Bribery and Corruption 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.

3. CONTEXT

Receipt by an Employee of a gift has the potential to create a conflict between the personal interests of the Employee and The Star's commercial and reputational interests. This may compromise the integrity of both the Employee and The Star.

Legislation governing the operation of The Star's casinos also includes prohibitions on certain employees soliciting or accepting gifts or other benefits. This Policy applies in addition to, not instead of, those laws.

4. WHAT IS A GIFT?

A gift is any gratuity, consideration or other benefit provided to an Employee and/or a member of the Employee's family for less than its market value and includes (but is not limited to):

- Money
- A tangible item of value
- A service of value
- Hospitality - where that meal, accommodation or experience of value is not related to a work function
- Any favour, promise or undertaking that will benefit the Employee and/or a member of the Employee's family

- Any other benefit or thing of value including gift vouchers, and free or discounted travel or accommodation.

For purposes of this Policy, a gift does **NOT** include a tip or gratuity provided to an Employee:

- who does not hold a Gaming Licence
- from a guest in connection with the provision by the Employee of hospitality services at one of The Star's bars, restaurants or hotels
- where the amount of the tip or gratuity is reasonable having regard to the hospitality services provided and in line with usual custom and practice.

Separate policies are in place regarding the pooling and distribution of tips and gratuities relating to hospitality services. For requirements related to Employees who are Licenced see section 5.2 and 5.3.

5. POLICY REQUIREMENTS

5.1 All Employees

All employees must:

- refrain from soliciting a gift or gifts from any person in connection with the Employee's work at The Star
- report all gifts received or offered in connection with the performance of their employment duties, regardless of value and regardless of whether the gift is able to be retained. Gifts must be reported on the Gift Register on The Star's intranet.
- report gifts received in circumstances which could be regarded as creating a conflict between the personal interest of the Employee and The Star's commercial or reputational interests. Such a circumstance must be reported to the General Manager in the Employee's reporting line
- wherever practicable, gifts which the Employee is not permitted to retain under this Policy should be refused or returned to the giver. In circumstances where, for cultural or other reasons, this may not be practicable, the gift must be reported in the Gift Register and forwarded to the Chief Legal and Risk Officer. The Chief Legal and Risk Officer shall determine the appropriate manner for disposing of or distributing gifts unable to be accepted by Employees, and shall report details to the Ethics Panel.

5.2 Employees holding a Gaming Licence

Employees who hold a casino gaming licence must:

- refuse gifts offered from any person in connection with the employee's work at The Star. As a condition of their licence, an Employee who holds a Gaming Licence is not permitted to accept and retain a gift from a player or guest. This prohibition is absolute. It does not matter whether the gift relates to the provision of hospitality services rather than gaming services. It does not matter whether the gift is provided on property or off property.
- wherever practicable, gifts which the Employee is not permitted to retain under this Policy should be refused or returned to the giver. In circumstances where, for cultural or other reasons, this may not be practicable, the gift should be reported in the Gift Register and forwarded to the Chief Legal and Risk Officer.

5.3 Employees who are Licenced in a Non-Gaming Function

An Employee who is licenced, but not working in a Gaming related function, may accept and retain a gift from a person other than a player or guest if:

- The value of the gift, when aggregated with the value of other gifts from the same person in the previous 12 months, does not exceed \$250; and
- The gift is reported in accordance with the requirements set out in section 5.1; and
- The gift does not compromise, and would not objectively be viewed as compromising, the Employee's independence and judgment in connection with any decision affecting The Star's business relationship with the giver of the gift. Viewed objectively, a gift given in advance of a decision affecting The Star's business relationship with the giver of the gift is more likely to be considered as having the potential to affect the recipient's independence or judgment in relation to the decision.

5.4 Non-Licenced Employees

Non-Licenced Employees may accept and retain a gift from a person if:

- The value of the gift, when aggregated with the value of other gifts from the same person in the previous 12 months, does not exceed \$250; and
- The gift is reported in accordance with the requirements set out in section 5.1; and
- The gift does not compromise, and would not objectively be viewed as compromising, the Employee's independence and judgment in connection with any decision affecting The Star's business relationship with the giver of the gift. Viewed objectively, a gift given in advance of a decision affecting The Star's business relationship with the giver of the gift is more likely to be considered as having the potential to affect the recipient's independence or judgment in relation to the decision.

6. REPORTING BREACHES OF THE POLICY

An Employee who becomes aware of an actual or suspected breach of the Policy should report the relevant details to any of the following:

- the Employee's immediate leader, manager, or other senior manager within the area where the Employee works
- the Group Investigations Manager
- any member of the Ethics Panel (contact details are set out in **Appendix A**)
- email callitout@star.com.au
- through The Star's independent and secure whistleblower service e-TIPS
(**Email: etips@etika.com.au Tel: 1 800 499 114 (free call within Australia)**)

All reports of actual or suspected breaches of this Policy must be referred to the Ethics Panel.

The Star's Whistleblower Policy will apply to protect any Employee who reports an actual or suspected breach of this Policy.

The Ethics Panel will investigate reports of actual or suspected breaches of the Policy.

7. ACCOUNTABILITY

7.1 The Star Board

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

7.2 PCSR Committee

The PCSR Committee is responsible for:

- Receiving reports from the Ethics Panel regarding breaches of the Policy
- Reviewing advice from the Ethics Panel regarding administration of the Policy and potential amendments and recommending amendments to the Board.

7.3 Ethics Panel

The Ethics Panel are responsible for:

- Overseeing the application of the Policy across SGR's business operations
- Investigation of reports of actual or suspected breaches of the Policy and, where an Employee is found to have breached the Policy, reporting that finding to Group People & Performance for consideration of appropriate disciplinary action
- Overseeing the periodic review of the Policy and recommending to the PCSR Committee any changes required to maintain the Policy's ongoing effectiveness
- Putting in place procedures for dissemination of, and monitoring compliance with, the Policy
- Providing an annual report to the PCSR Committee of matters relevant to the ongoing effectiveness of the Policy, including a summary of gifts reported on SGR's Gift Register.

7.4 The Star Leaders

The Star Leaders are responsible for:

- Promoting compliance with this Policy, including reminding Employees about the requirement to report all gifts received in connection with employment duties
- Assisting Employees in identifying whether the value of a gift and the circumstances in which it is received affect whether the Employee can retain the gift
- Monitoring whether an Employee's independence and judgment might be impaired in connection with any decision affecting The Star's business relationship with the giver of the gift.

7.5 All Employees

All Employees are responsible for:

- Complying with this Policy in relation to all gifts offered or given to them by a person (other than a fellow Employee) in connection with the Employee's work at The Star.

8. ADMINISTRATION OF THE POLICY

The Ethics Panel are responsible for administration of this Policy.

Details of the 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.

Changes to this Policy must be approved by the Board.

9. RELATED AND SUPPORTING POLICIES

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

- Code of Conduct
- Whistleblower Policy
- Conflict of Interest Policy
- Procurement Policy
- Delegated Authorities Policy

10. GLOSSARY

Employees means everyone who performs work for and on behalf of SGR inclusive of all contractors and labour hire firms.

Ethics Panel means the Ethics Panel established under the Code of Conduct.

Gaming Licence means a licence issued by the state regulator enabling an employee to conduct duties associated with gaming. Holders of Gaming Licences are: Casino Special Employees (NSW) or Key Employees (QLD) or Casino Employees (QLD).

The Star Leaders means any employee who exercises the function of a manager or supervisor of other employees.

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

Work means either paid or unpaid duties designed to advance the business interests of The Star Entertainment Group Limited and all of its related bodies corporate.

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	<p>We Respect the Community</p> <p>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.</p>	Do the Right Thing, Welcoming
2	<p>We are Diverse</p> <p>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.</p>	Do the Right Thing, Welcoming
3	<p>We Comply with the Law</p> <p>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.</p>	Ownership, Do the Right Thing, True Teamwork
4	<p>We are Ethical</p> <p>We conduct our business with honesty and integrity as this is the basis for maintaining our reputation.</p>	Ownership, Do the Right Thing, True Teamwork
5	<p>We are Professional</p> <p>We take ownership of our actions and aim for excellence in everything we do.</p>	Do the Right Thing, Welcoming, Ownership, True Teamwork
6	<p>We Work Safely</p> <p>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.</p>	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