



Supplier Code of Conduct – November 2019

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Aristocrat - Supplier Code of Conduct

INTRODUCTION

Aristocrat Leisure Limited and its affiliates (collectively, 'Aristocrat Group') are committed to ensuring that working conditions in Aristocrat Group's operations and in its supply-chains are safe, that all workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically.

This Supplier Code of Conduct (the 'Supplier Code') reflects Aristocrat Group's values, and Aristocrat Group has developed the following requirements for its direct suppliers (each a 'Supplier') based on the modern slavery legislation in Australia and the United Kingdom, the Responsible Business Alliance Code of Conduct and other international standards.

All Suppliers to Aristocrat Group must adhere to the principles set out in this Supplier Code. Aristocrat Group will assess a Supplier's commitment to compliance with the requirements of the Supplier Code when making sourcing decisions, including decisions about the selection, retention, and termination of Suppliers. Consequences for non-compliance will depend on the nature of the violation and, at Aristocrat Group's discretion, may include the suspension or termination of Aristocrat Group's relationship with any non-compliant Supplier.

Aristocrat Group's goal is to work with Suppliers to improve conditions through communications, training, monitoring and follow-up assessments and expects Suppliers to cooperate with Aristocrat Group to identify and remediate potential violations of the Supplier Code.

Suppliers must in all their activities for or on behalf of Aristocrat Group follow the applicable laws, rules and regulations of the countries in which they operate. Where this Supplier Code imposes more onerous requirements than applicable local laws, rules or regulations, Aristocrat Group expects Suppliers to adhere to the applicable local laws, rules and regulations, as well as the requirements set out in the Supplier Code. Similarly, if applicable local laws, rules or regulations or any contract between Aristocrat and a Supplier impose stricter or more detailed requirements than this Supplier Code, then we expect Suppliers to meet the stricter or more detailed legal, regulatory or contractual requirements as well as the requirements of the Supplier Code.

LABOUR STANDARDS

Aristocrat Group is committed to upholding the human rights of workers and to treating them with dignity and respect as understood by the international community. This applies to all workers, including temporary, migrant, student, contract, direct employees and any other type of worker, including Suppliers' workers. Aristocrat Group seeks to adhere to the UN Guiding Principles on Business and Human Rights ('UN Guiding Principles'), which are the recognised global standard for preventing and addressing business-related human rights harm. In particular, Aristocrat Group is committed to applying the UN Guiding Principles in its approach to modern slavery.

The labour standards are as follows:

- **Freely Chosen Employment; Prohibition of Modern Slavery and Human Trafficking**
Suppliers must not use or permit any form of slavery or servitude, including forced, compulsory, bonded (including debt bondage) or indentured labour, involuntary prison labour, child labour, or sex trafficking. In addition, Suppliers must not engage in any human trafficking, including transporting, harbouring, recruiting, transferring or receiving any person by means of threat, force, coercion, abduction, fraud, deception, abuse of power or vulnerability, or the giving of payments or other benefits for the purpose of exploitation (including any form of slavery or servitude). All work must be voluntary and all workers, including student interns, must be free to leave work at any time or terminate their employment without reprisal, subject to any reasonable notice periods required under applicable law. Suppliers must not require workers to surrender any government-issued identification, passports or work permits as a condition of employment. Suppliers must not impose any unreasonable restrictions on workers' freedom of movement within the Suppliers' facilities, or with respect to workers' rights to enter or exit the Suppliers' facilities.
- **Contracting Standards**

As part of the hiring process, Suppliers must provide workers with a written employment agreement in their native language that contains a description of terms and conditions of employment. For workers recruited outside the Suppliers' country of operation, Suppliers must ensure that the written employment contract is provided to workers prior to the workers departing from their respective countries of origin and there should be no substitution or change(s) allowed in the employment contract upon arrival in the Suppliers' country of operation unless such changes are required to meet applicable laws or regulations and provide equal or better terms. Suppliers must ensure that terms and conditions of employment comply with any applicable laws or regulations in their country of operation. In addition, Suppliers must ensure that workers are not required to pay employers' or agents' recruitment fees or other related fees for their employment. If any such fees are found to have been paid by workers, such fees must be repaid to the worker.

- **Child Labour Avoidance; Student Interns**

Suppliers must not use child labour. For purposes of this prohibition, the term 'child labour' refers to the labour of persons below the greater of the following ages: (i) the minimum age for employment in the country of employment; or (ii) the age for completing compulsory education in the country of employment. However, in countries where the minimum age for employment or the age for completing compulsory education is below 15 years old, Aristocrat Group expects Suppliers to use their best efforts to ensure that they do not employ any workers below that age by 31 December 2021, even if applicable laws in the countries of employment continue to permit employment of such workers. Suppliers may use legitimate, voluntary workplace apprenticeship programs, such as student internships, only if they comply with all laws and regulations of the country of employment, and if the participants receive some form of compensation for their work. Appropriate compensation may include academic credit for a course of study at a reputable educational institution, or wages consistent with the rate for other entry-level workers performing equivalent tasks. Suppliers should ensure proper management of participants in legitimate, voluntary workplace apprenticeship programs through the provision of appropriate support and training to participants, proper maintenance of participant records, rigorous due diligence of educational partners, and protection of participants' rights in accordance with applicable laws and regulations. Suppliers must not ask workers to perform work that is likely to jeopardise their health, safety or well-being.

- **Working Hours**

Suppliers' work weeks must not exceed the maximum set by applicable local law. In countries where applicable local law permits workers to work more than 60 hours per week, Aristocrat Group expects Suppliers to use their best efforts to comply with a 60-hour maximum working week by 31 December 2021, even if applicable laws in the countries of employment continue to permit working in excess of this limit. Suppliers must ensure that workers receive at least one day off every seven days.

- **Wages and Benefits**

Suppliers must ensure that compensation paid to workers complies with all applicable wage laws, including those relating to minimum wages, overtime hours and legally mandated benefits. Suppliers must compensate workers for overtime consistent with applicable local law and must clearly state in employment agreements if mandatory overtime is a condition of employment. In countries that do not have laws or regulations stipulating minimum wages, overtime pay requirements, or workplace benefits, Aristocrat Group expects Suppliers to use their best efforts to at least follow industry standards within the country by 31 December 2021. Suppliers must not permit deductions from wages as a disciplinary measure. Suppliers must provide workers with a timely and understandable written statement explaining the basis on which workers are paid, via pay stub or similar documentation, so that workers can verify that they have been accurately compensated for the work they have performed.

- **Humane Treatment**

Suppliers must not engage in or tolerate harsh and inhumane treatment, including any sexual harassment, sexual abuse, corporal punishment, mental or physical coercion or verbal abuse of workers, including the threat of any such treatment. Suppliers must clearly define and communicate to workers the disciplinary policies and procedures in support of these requirements.

- **Non-Discrimination**

Suppliers must be committed to a workforce free of harassment and unlawful discrimination, and must not engage in discrimination based on race, colour, age, gender identity, sexual orientation, ethnicity, caste, national origin, disability, pregnancy, religion, political affiliation, union membership, covered veteran status, protected genetic information, marital status, or any other characteristic protected under applicable laws in hiring and employment practices such as wages, benefits, promotions, rewards and access to training. In addition, Suppliers must not subject workers or potential workers to medical tests or physical examinations that could be used in a discriminatory way.

- **Freedom of Association and Collective Bargaining**
Open communication and direct engagement between workers and management are the most effective ways to resolve workplace and compensation issues. Suppliers must respect the rights of workers to associate freely, bargain collectively, join or not join labour unions or similar organizations, seek representation, and join workers' councils in accordance with local laws. Suppliers must permit workers to openly communicate and share grievances with management about working conditions and management practices without fear of discrimination, reprisal, intimidation or harassment.
- **Immigration Law and Compliance**
Suppliers must ensure that all of their workers, including migrant and foreign workers, are employed or retained in full compliance with applicable immigration and labour laws.

HEALTH AND SAFETY STANDARDS

Suppliers must recognise that, in addition to minimising the incidence of work-related injury and illness, a safe and healthy work environment enhances the quality of products and services, consistency of production and worker retention and morale. Suppliers must also recognise that ongoing worker input and education is essential to identifying and solving health and safety issues in the workplace.

The health and safety standards are as follows:

- **Health & Safety Management System**
Suppliers must have a Health & Safety Management System. The Health & Safety Management System must be implemented and functioning. Third-party registration is strongly recommended but not required unless requested by Aristocrat Group. Systems in accordance with AS/NZS 4801, ISO 45001 or equivalent are highly regarded.
- **Occupational Safety**
Suppliers must control worker exposure to potential safety hazards (e.g. electrical and other energy sources, fire, vehicles, extreme temperature and sound exposure and fall hazards) through proper design, engineering and administrative controls, preventative maintenance and safe work procedures and ongoing safety training. Where hazards cannot be adequately controlled by these means, Suppliers must provide workers with appropriate, well-maintained, personal protective equipment. Suppliers must not discipline or take any retaliatory measures against workers for raising safety concerns in good faith.
- **Emergency Preparedness**
Suppliers must identify and address potential emergency situations and events and minimise their impact by implementing emergency plans and response procedures, including emergency reporting, employee notification and evacuation procedures, worker training and drills, appropriate fire detection and suppression equipment, adequate exit facilities and recovery plans.
- **Occupational Injury and Illness**
Suppliers must have procedures and systems in place to prevent, manage, track and report occupational injury and illness, including provisions to encourage worker reporting, classify and record injury and illness cases, provide necessary medical treatment, investigate cases and implement corrective actions to eliminate their causes and facilitate return of workers to work.
- **Industrial Hygiene**
Suppliers must identify, evaluate, monitor and control worker exposure to chemical, biological and physical agents. Suppliers must use engineering or administrative controls to control over-exposures. When Suppliers cannot adequately control these hazards by such means, Suppliers must protect worker health by appropriate personal protective equipment programs. Protective equipment programs should include educational materials about the risks associated with these hazards.
- **Physically Demanding Work**
Suppliers must identify, evaluate, monitor and control worker exposure to ergonomic and physical stressors, including manual material handling and heavy or repetitive lifting, prolonged standing and highly repetitive or forceful assembly tasks.
- **Machine Safeguarding**
Suppliers must evaluate production and other machinery for safety hazards. Suppliers must provide and properly maintain physical guards, interlocks and barriers where machinery presents an injury hazard to workers.
- **Sanitation, Food and Housing**
Suppliers must provide workers with ready access to clean toilet facilities, drinking water and sanitary

food preparation, storage and eating facilities. Suppliers must ensure that worker dormitories are clean and safe and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, heat and ventilation and reasonable personal space along with reasonable entry and exit privileges.

ENVIRONMENTAL STANDARDS

As part of its compliance program, Aristocrat Group is committed to integrating social, environmental and ethical sourcing practices and sustainability principles within its global operation and supply chain. Aristocrat expects Suppliers and contractors to not only comply with all laws, but to take all reasonable steps to minimise risks and negative impacts to the environment and community, and to conduct business in a socially responsible and ethical manner.

The environmental standards are as follows:

- **Environmental Management System**
Suppliers must have an Environmental Management System ('EMS'). The EMS must be implemented and functioning. Third-party registration is preferred but not required unless specifically requested by Aristocrat Group. An EMS in accordance with ISO 14001 or equivalent would be highly regarded.
- **Environmental Permits and Reporting**
Suppliers must maintain and keep current all required environmental permits (e.g. discharge monitoring), approvals and registrations and Suppliers must follow their operational and reporting requirements.
- **Hazardous Substances**
Suppliers must identify and manage chemicals and other materials posing a hazard to human health, human safety or the environment to ensure their safe handling, movement, storage, use, recycling or reuse and disposal.
- **Wastewater and Solid Waste**
Suppliers must characterise, monitor, control and treat as required prior to discharge or disposal all wastewater and solid waste generated from operations, industrial processes and sanitation facilities.
- **Air Emissions**
Suppliers must characterise, monitor, control and treat as required prior to discharge all air emissions of volatile organic chemicals, aerosols, corrosives, particulates, ozone depleting chemicals and combustion by-products generated from operations.
- **Product Content Restrictions**
Suppliers must adhere to all applicable laws, regulations and Aristocrat Group requirements regarding prohibition or restriction of specific substances, including labelling for recycling and disposal.
- **Resource Efficiency**
Aristocrat Group is committed to using resources efficiently, supporting renewable power and purchasing high quality carbon offsets. Aristocrat Group wants Suppliers who share our commitment to the environment and who conduct their business in a similar way. Suppliers must work to reduce consumption of resources, including raw materials, energy and water, throughout all aspects of the product lifecycle (e.g. product design, manufacturing process, packaging design, transportation, product use and product end-of-life management).
- **Materials Disposal**
Suppliers must manage and dispose of all materials in accordance with applicable laws, rules, regulations and directives, and in an environmentally responsible and secure manner, protective of the environment. At Aristocrat Group's request, Suppliers must provide documentary evidence acceptable to Aristocrat Group confirming that Suppliers have managed and disposed of materials in accordance with this Supplier Code.

ETHICAL STANDARDS

To meet social responsibilities and to achieve success in the marketplace, Suppliers must uphold the highest ethical standards including:

- **Business Integrity; No Improper Advantage**
Suppliers must uphold the highest standards of integrity in all business interactions. Suppliers must have a zero-tolerance policy for offering and accepting any and all forms of bribery, corruption, extortion and

embezzlement (including promising, offering, giving or accepting any bribes). Suppliers must perform all business dealings transparently and these dealings must be accurately reflected in Suppliers' business books and records. Suppliers must not make illegal payments themselves or through a third party (such as an agent). Suppliers must implement monitoring and enforcement procedures to ensure compliance with anti-corruption laws.

- **Disclosure of Information**
Suppliers must disclose information regarding business activities, structure, financial situation and performance in accordance with applicable regulations and prevailing industry practices. Falsification of records or misrepresentation of conditions or practices in the Supply Chain is unacceptable and not permitted.
- **Intellectual Property**
Suppliers must respect intellectual property rights and conduct the transfer of technology and know-how in a manner that protects intellectual property rights.
- **Fair Business, Advertising and Competition**
Suppliers must comply with all applicable fair business, advertising and competition laws, including fair trading and anti-trust laws.
- **Responsible Sourcing of Minerals**
Suppliers must comply with any laws, regulations or rules regulating or imposing standards of conduct relating to the extraction, processing, transportation, trade or use of Conflict Minerals, including, without limitation, (i) Regulation (EU) 2017/821 of the European Parliament and of the Council of 17 May 2017 and any related implementing legislation in any of the European Union Member States, and (ii) Section 1502 of the Dodd-Frank Wall Street Reform and Consumer Protection Act and any rules issued by the U.S. Securities and Exchange Commission pursuant to that provision including, without limitation, 17 CFR 240.13p-1 (collectively, the "Conflict Minerals Laws"). For these purposes, the term "Conflict Minerals" means gold, wolframite, cassiterite, columbite-tantalite and their derivative metals, which include tin, tungsten and tantalum, and any other minerals that have been extracted, processed, transported or traded in a way that could fund or support conflict, human rights abuses, or other illegal practices. Suppliers must exercise due diligence and adopt policies and procedures to comply, and demonstrate compliance, with the Conflict Minerals Laws, including with respect to the source and chain of custody of any Conflict Minerals. Suppliers must make their due diligence materials available to Aristocrat Group upon Aristocrat Group's request and must respond to Aristocrat Group's requests for related information in a timely manner.
- **International Trade**
Suppliers must comply with all applicable laws and regulations concerning importing and exporting products and services.
- **Privacy**
Suppliers must commit to protecting the reasonable privacy expectations regarding personal information of everyone they do business with, including suppliers, customers, consumers and employees. Suppliers must comply with privacy and information security laws and regulatory requirements when personal information is collected, stored, processed, transmitted and shared.
- **Non-Retaliation**
Suppliers must have a communicated process for their personnel to be able to raise any concerns without fear of retaliation. Suppliers must also maintain programs that ensure the confidentiality and protection of supplier and employee whistle-blowers.

MANAGEMENT SYSTEMS

Suppliers must adopt or establish a management system whose scope is related to the content of this Supplier Code. The management system must be designed to ensure: (a) compliance with applicable laws, regulations and Aristocrat Group requirements related to the Supplier's operations and products; (b) conformance with this Supplier Code; and (c) identification and mitigation of operational risks related to this Supplier Code. It should also facilitate continual improvement.

Although each Supplier's management system should be developed and implemented in a risk-based and proportionate manner, taking into account the specific risk profile and characteristics of each Supplier, as a general principle, all Suppliers' management systems should seek include the following elements:

- **Company Commitment**
Suppliers should develop and adopt one or more clear policy statements affirming their commitment to compliance with applicable laws and regulations and the requirements set out in this Supplier Code, and to continual improvement, endorsed by executive management.
- **Management Accountability and Responsibility**
Suppliers should clearly identify company representatives responsible for ensuring implementation of the management systems and associated programs. Suppliers' senior management must review the status and effectiveness of the management system on a regular basis.
- **Legal and Aristocrat Group Requirements**
Suppliers should periodically conduct a risk assessment or similar process to identify, monitor and understand applicable laws, regulations and Aristocrat Group requirements, including the requirements of this Supplier Code.
- **Risk Assessment and Risk Management**
Suppliers should periodically conduct a risk assessment or similar process to identify the environmental, health and safety, labour standards, and ethics risks associated with their operations. Suppliers must use the process to identify the relative significance of each risk, and to develop and implement appropriate policies, procedures and other measures to mitigate the identified risks and ensure compliance with applicable laws and regulations, as well as this Supplier Code.
- **Improvement Objectives**
Suppliers should use written performance objectives, targets and time-limited implementation plans to improve their compliance programs, and conduct periodic assessments of their performance in meeting their objectives, targets and implementation plans.
- **Sub-Suppliers**
Suppliers should adopt and implement appropriate measures — which may include due diligence procedures, contractual standards, training and communications, and monitoring mechanisms — to ensure that any of their own sub-suppliers who are directly or indirectly involved in the provision of goods or services to Aristocrat Group adhere to the standards outlined in this Supplier Code, as well as any applicable legal and regulatory requirements.
- **Training and Communication**
Suppliers should adopt training and communication programs for managers and workers to raise awareness of applicable legal and regulatory requirements, the principles set out in this Supplier Code, and the Supplier's own policies and procedures, and to set an appropriate culture.
- **Worker Feedback and Participation**
Suppliers should adopt ongoing processes to assess workers' understanding of the requirements of this Supplier Code, and to obtain feedback on working practices and conditions addressed in this Supplier Code, in order to foster continuous improvement of Suppliers' practices and conditions.
- **Audits and Assessments**
Suppliers should conduct periodic self-evaluations or commission periodic independent reviews to ensure conformity to legal and regulatory requirements, the standards of the Supplier Code, and any contractual requirements related to social and environmental responsibility imposed by Aristocrat Group.
- **Corrective Action Process**
Suppliers should adopt and implement a process for timely correction of actual or potential violations of the Supplier Code that are identified by internal or external assessments, inspections, investigations or reviews.
- **Documentation and Records**
Suppliers should create and maintain documents sufficient to record the steps taken to comply with this Supplier Code.
- **Ongoing Audits, Assessments, Monitoring and Continued Improvement**
Aristocrat Group intends to closely monitor Suppliers' compliance with the requirements set out in this Supplier Code using a risk-based approach which may mean that some Suppliers are monitored more closely than others. If requested by Aristocrat Group, Suppliers must provide information sufficient to establish compliance with this Supplier Code to Aristocrat Group's reasonable satisfaction. Such information may include, among other things and without limitation, information on social and environmental policies, procedures, risk assessments, and monitoring activities, product content details, environmental metrics (e.g. greenhouse gas emissions, water use, water quality data), social metrics (e.g. working hour data, wage information, injury rates), and management systems certifications. In addition, Suppliers must cooperate

with announced or unannounced formal assessments and audits by Aristocrat Group and its advisors (and any such advisors will be subject to obligations of confidentiality with respect to any information provided by Suppliers for purposes of Aristocrat Group assessments and audits). In particular, Suppliers must allow Aristocrat Group and its representatives unimpeded access to facilities and workers upon Aristocrat Group's reasonable request.

References

The following standards were used in preparing this Supplier Code and may be a useful source of additional information:

- Dodd-Frank Wall Street Reform and Consumer Protection Act
- [Responsible Business Alliance Code of Conduct](#)
- Ethical Trading Initiative
- ILO Code of Practice in Safety and Health
- ILO International Labour Standards
- ISO 14001
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas
- OECD Guidelines for Multinational Enterprises
- AS/NZS 4801
- ISO 45001
- SAI/SA 8000