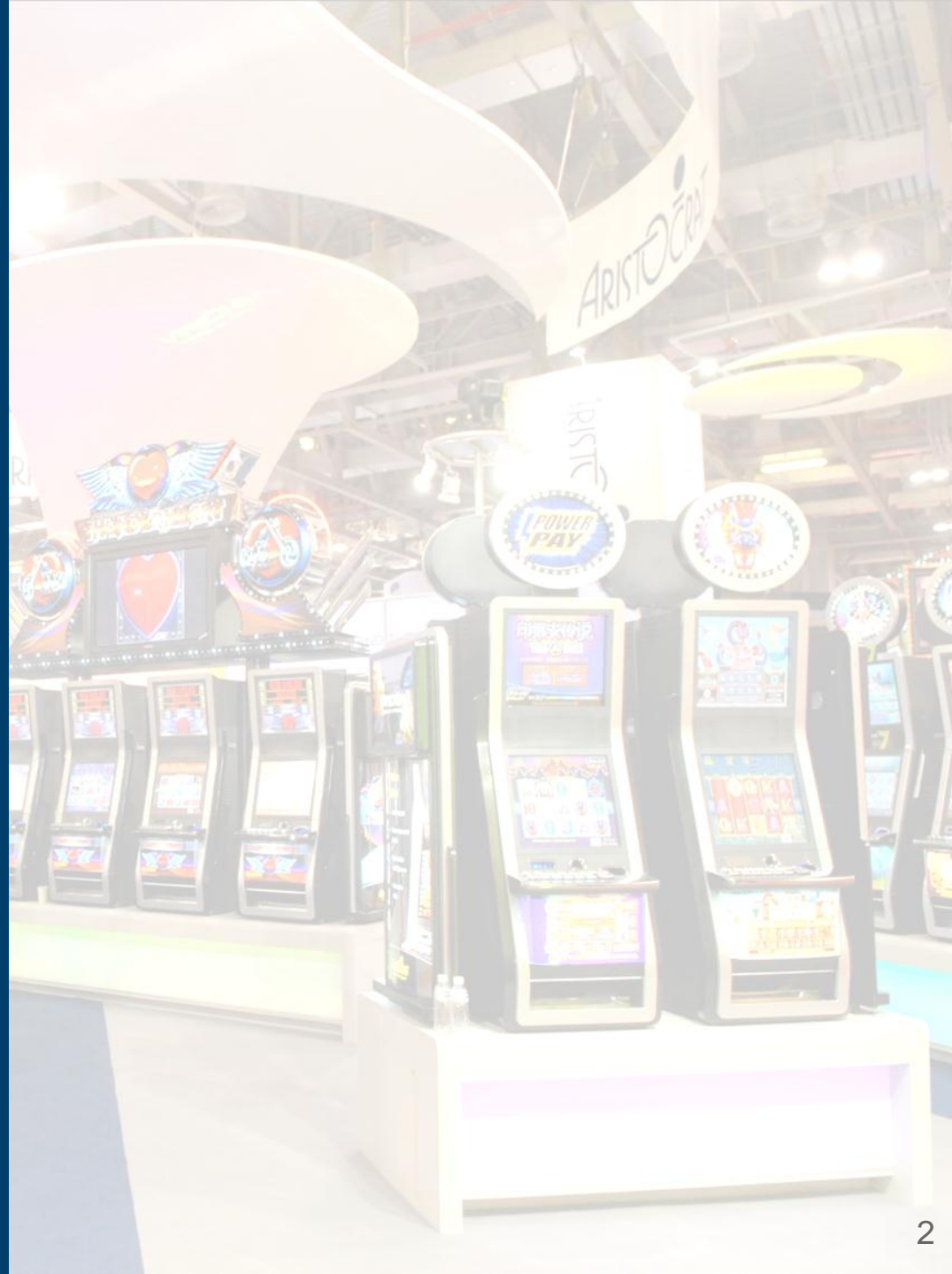


Global Employee Handbook and Code of Conduct



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Welcome to Aristocrat

Aristocrat is dedicated to designing and developing world-class software and producing gaming solutions that consistently outperform the competition. Aristocrat is an Australian-owned and a globally managed company with a long and successful involvement in the gaming and entertainment industry in Australia and throughout the world.

Aristocrat began corporate life in 1953 as a gaming hardware supplier, evolving into a gaming technology group that places high value on software and content. The Company's many businesses around the globe strengthen the well-known Aristocrat brand.

Aristocrat employs over 2,200 people worldwide. Our head office is in Sydney, Australia and we have offices in the United States, New Zealand, Europe, Asia, South Africa, Sweden and Japan.

Aristocrat operates in a highly regulated environment and our decisions can affect both our environment and the wider community. As a result, we have high expectations of our employees and we take a "zero tolerance" approach to breaches of our policies and procedures and the laws that govern how we operate.

This Employee Handbook and Code of Conduct ("the Handbook") provides an ethical framework for the way in which the Company conducts its business and contains a set of general business ethics. The Handbook applies to all employees, executive directors, non-executive directors and contracted employees ("Employees") and should be used as a guide for ethical decision making.

Welcome to Aristocrat

This Handbook also contains an overview of Aristocrat's policies and procedures. Your employment/engagement with Aristocrat is conditional upon you familiarising yourself with the material outlined in this Handbook and we seek your commitment to compliance with all aspects.

You should also be aware that this information is available in greater detail in Aristocrat's Global Policies and Procedures System. This information will assist you to perform your duties and ensure quality products and services are delivered to our customers and comply with all the laws that impact on Aristocrat. Our Global Policies and Procedures are available on the Intranet. For regional offices without access to the Company's Intranet, a copy can also be obtained from your Local Compliance Officer.

If you have any questions about any policy, procedure or particular situation, please speak to your supervisor, manager or contact Human Resources or Compliance.

Our Environment

Aristocrat is licensed by or otherwise subject to regulation by various gaming regulatory authorities throughout the world. It is a condition upon some of our licenses that we must establish comprehensive and effective global policies, procedures and processes to ensure all business dealings are conducted with the highest levels of integrity.

In some jurisdictions, Aristocrat is also required to maintain a Compliance Plan outlining how it meets obligations in relation to the manufacture and supply of gaming equipment. In particular, you are required to familiarise yourself with the Nevada Gaming Control Board approved Compliance Plan which is available on the Intranet under the Global Policies section.

As a result, Aristocrat has adopted a Regulatory Compliance Program to maintain its continuing suitability for licensing by gaming regulatory authorities. The Program requires Aristocrat to perform certain tasks including: establishing the suitability of key associates such as employees, customers, suppliers, agents; and distributors; conducting internal investigations; liaison with gaming regulators; development, implementation and monitoring of ongoing compliance training programs; and generally promoting an environment of ethical behaviour and decision making.

This Program has been designed to ensure Aristocrat and its employees conduct their business dealings in a professional and compliant manner at all times.

To further enhance this Program, Aristocrat has implemented global mandatory Compliance training courses and assessment tasks. The assessment tasks must be completed by all new employees within 90 days of the commencement of their employment. In addition, when new training is introduced, all employees are required to undertake the training and are obligated to complete it within the given timeframe.

Our Rules and Expectations

As an employee of Aristocrat, you are subject to various rules, procedures, policies and standards on topics including, but not limited to:

- working and acting safely;
- proper use of Aristocrat property, including internet and email facilities;
- conduct during work hours;
- workplace violence and bullying;
- dishonesty, fraud and misuse of the company's assets;
- treating the environment with respect;
- misrepresentation;
- alcohol, drugs (including substance abuse) in the workplace; and
- disclosure of company information



You and Aristocrat

Rules Are There to Protect Everyone

Not complying with Aristocrat's rules may mean that you are not operating in accordance with the laws impacting Aristocrat and our licenses. Failure to comply with Aristocrat's Global Policies and Procedures, Occupational Health and Safety Procedures, Local Operating Procedures or this Handbook may attract disciplinary action which may take the form of counselling, warnings or termination of your employment.

This section of the Handbook outlines the key principles of some of Aristocrat's Human Resources ("HR") policies and procedures. It is your responsibility to familiarise yourself with these policies and procedures.

Alcohol, Drugs and the Workplace

Aristocrat has a zero-tolerance policy on the use of prohibited drugs and/or alcohol that may impair an employee's capacity to perform their job safely, efficiently and with respect for work colleagues and customers. The use of such substances may result in the risk of injury or a threat to the wellbeing of the impaired employee, other employees, customers or any third parties.

At all times, the perception of Aristocrat employees by customers, suppliers and members of the community is paramount. It is expected that the behaviour of Aristocrat employees, particularly at work-related functions, is professional, courteous and does not in any way bring the Company into disrepute or damage company relationships with other parties.

This extends to all social functions.

You and Aristocrat

Workplace Violence, Bullying and Harassment

Aristocrat's Workplace Violence, Bullying and Harassment policies are aimed at ensuring that employees are not subjected to any unwanted workplace violence, bullying, harassment or offensive language/behaviour.

Violence, or threats of violence, and bullying in the workplace decreases productivity, increases absenteeism, and is also against the law in Australia and many other countries in which Aristocrat operates.

Bullying in the workplace is harmful to the victims and workplace culture and for these reasons this type of behaviour will not be tolerated at Aristocrat.

Each area of the business has in place formal grievance and investigative procedures to deal with these issues.

You and Aristocrat

Internet and Email Use

Aristocrat provides Internet and e-mail capability to certain employees to facilitate efficient business communications and to support the information needs of Aristocrat. Aristocrat employees and contractors may be granted access to these systems for the purpose of conducting legitimate Aristocrat business.

While the Company accepts that employees will use the email system during the day for their personal use, it is expected this privilege is not abused. Employees are to minimise sending and receiving personal e-mails, and surfing the web, by limiting this activity to their break, to ensure that such use is brief and infrequent. Care must also be taken to ensure that personal use does not impact on individual productivity or that of other employees or resources.

Some use of the internet / email system is prohibited at all times. For example, accessing, viewing or transmitting pornographic, offensive or discriminatory information, and downloading or transmitting information that is protected by copyright such as music and movies is a breach of these policies.

Refer to Global Policy EI.29 Internet, Email and IT Usage Policy

Social Media Participation at Aristocrat

What is Social Media?

Social media, encompasses a website that allows you to instantaneously share information with a group. You can share information with people you've opted to communicate with on a site like Facebook or Yammer, or an anonymous group, such as followers of a blog.

Social media also allows you to connect with others, build relationships and contribute to discussions.



You and Aristocrat

Social Media Participation at Aristocrat

Do These Guidelines Apply to Me?

These social media guidelines apply to Aristocrat employees or contractors who create or contribute to blogs, wikis, social networks, virtual worlds, or any other kind of social media both internally and externally that involves Aristocrat.

Whether you log into Twitter, Wikipedia, MySpace or Facebook pages, comment on online media stories, or participate in internal forums, such as discussion boards on Ally or Yammer — these guidelines apply to you.

What are the Guidelines?

While all Aristocrat employees are welcome to participate in social media, we expect everyone who participates to understand and to follow these simple but important guidelines. These guidelines might sound strict and contain a bit of legal-sounding jargon but please keep in mind that our overall goal is simple: to participate online in a respectful, relevant way that protects our reputation and of course follows the law.

You and Aristocrat

Social Media Participation at Aristocrat

What are the Guidelines?

- Please disclose only publicly available information. You must not comment on or disclose confidential Aristocrat information (such as financial information, future business performance or business plans). If you require clarification about what Aristocrat information is in the public domain, you should refer to our website or consult Corporate Communications in Sydney;
- Respect the intellectual property of Aristocrat and other companies or individuals. Don't distribute Aristocrat-owned logos, music, sound or graphics, nor download music or graphics which belongs to others;
- Never represent yourself or Aristocrat in a false or misleading way. All statements must be true and not misleading; all claims must be substantiated.
- Never comment on anything related to legal matters, litigation, or any parties Aristocrat may be in litigation with;
- Under gaming regulations in Australia, Aristocrat is not permitted to promote its products or services through social media. In view of this, comments about Aristocrat products on external social media platforms must only be posted on our United States social media sites and must relate to products and services available in the USA. To ensure strict compliance with this requirement, only nominated Marketing personnel are authorised to post to these sites;
- Photographs of employees or personal information relating to any employee, must not be published without the specific permission of the employee, unless it is being published in an approved corporate publication;

You and Aristocrat

Social Media Participation at Aristocrat

What are the Guidelines?

- Be mindful during your social media engagements of the importance of not damaging the company's reputation, commercial interests and/or bringing Aristocrat into disrepute;
- Post meaningful, respectful comments — in other words, no spam and no remarks that are off-topic or offensive such as racist or sexist remarks;
- Be smart about protecting your privacy. What you publish is widely accessible and will be around for a long time, so consider the content carefully. Facebook has a long memory;
- When disagreeing with others' opinions, keep it appropriate and polite. If you find yourself in a situation online that looks as if it's becoming antagonistic, do not get overly defensive and do not disengage from the conversation abruptly. Feel free to ask the Corporate Communications department for advice and/or to disengage from the dialogue in a polite manner that reflects well on Aristocrat;
- Carefully consider what you write about our competitors, and in particular do not criticise their products, organisation or employees;
- Never participate in social media when the topic being discussed may be considered a crisis situation involving Aristocrat or its people. Even anonymous comments may be traced back to your or Aristocrat's IP address. Refer all social media activity around crisis topics to Corporate Communications and/or the Legal department;

You and Aristocrat

Social Media Participation at Aristocrat

What are the Guidelines

- Try to add value. Aristocrat's brand is best represented by its people and everything you publish reflects upon it. If it helps you, your co-workers, our customers to do their jobs and solve problems; if it helps to improve knowledge or skills; if it contributes directly or indirectly to the improvement of Aristocrat's products, processes and policies; then it is adding value.

Refer to Global Policy EI.29
Internet, Email and IT Usage Policy

Refer to Global Policy TB.19
Continuous Disclosure Policy

You and Aristocrat

Whistle-blowers / Tip-Offs Anonymous

In view of Aristocrat's commitment to strong corporate governance, the Company encourages a culture in which people wish to work and in which incidences of misconduct are identified and reported.

To assist in achieving this aim, Aristocrat provides an independent service - "Tip-offs Anonymous". Tip-offs Anonymous is an independent, confidential telephone, email and mail service that provides an effective channel for employees to anonymously report instances of suspected misconduct. This service allows you to report incidents such as (but not limited to) the following:

- Theft
- Fraud
- Breaches of Policy / Procedure
- Discrimination
- Harassment / Bullying
- Workplace safety and environmental hazards
- Misconduct or other unethical behaviour

To report suspected misconduct by telephone, simply dial one of the following numbers in your region between the hours of 7.30am and midnight local time:

Australia	1800 769 577
USA	1866 788 5082
United Kingdom	0800 056 9945
New Zealand	0800 440 902
South Africa	0800 993 151
Japan	0034 800 400577

Alternatively, you may wish to send an email to: aristocrat@tip-offsanonymous.com.au

You and Aristocrat

Personal Information

Personal information is any information that can identify a person, even if this information does not identify a person by name.

Personal information relating to our employees includes: physical description, address, place of work, employment details, investments and financial data, relationship and personal interests.

Information that is also of a sensitive nature such as race or ethnic origin, political opinions, religious beliefs, memberships of a trade union, sexual references, criminal records and health information is considered to be personal information.

Aristocrat and its employees must protect any information of a personal and or sensitive nature and ensure there are mechanisms in place to prevent unlawful access to or use of such information. Misusing another person's personal information is a serious offence.

Refer to Global Policy EI.02 Privacy of Personal Information

You and Aristocrat

Security of Aristocrat Assets

Motor vehicles, laptop computers, Internet access, mobile and smart phones and other tools are provided to employees for business purposes. Employees must keep all portable items issued to them secure and in good order.

Any employee who is assigned with a lockable office is to make sure that the office door is locked prior to leaving at the end of each day. Where an employee does not have a lockable office, company issued portable items should be secured in a lockable receptacle such as a desk drawer or cabinet. This is specifically important for laptops and smart phones.

Employees who abuse items or are negligent in securing Aristocrat property may have usage withdrawn or be asked to cover any necessary costs.

Refer to Global Policy EI.05 Security of Aristocrat Assets

Smoke Free Zone

All Aristocrat workplaces are smoke free zones, including showroom facilities.

Local Human Resources Policies and Procedures

This Handbook is not designed to outline or encompass all HR policies and procedures. For full information on all other policies and procedures that relate to your employment with Aristocrat, visit the Intranet site, speak with your manager / team leader, or your local HR representative.



Integrity at Work and Play

Public Requests for Information

Aristocrat is a publicly listed company with its shares traded on the Australian Stock Exchange. The Listing Rules of the Australian Stock Exchange require disclosure of information likely to have an effect on the value of the shares of Aristocrat.

All public inquiries for information concerning the Company should be referred promptly to the Corporate Affairs Department.

Media Enquiries

All general media inquiries should be directed to the Corporate Affairs Department. No employee is permitted to be interviewed by or make comment on the Company to journalists without prior permission from the Head of Corporate Affairs.

Integrity at Work and Play

Confidential Information

During your employment at Aristocrat, you may have access to information that is confidential or sensitive such as financial information not generally known to the public, transactional information, designs and inventions, software mathematics and future strategic objectives.

Information of a confidential or sensitive nature must not be removed from the workplace or copied for use outside of the Company without the written authorisation from a Level 4 signatory or above. The only exception to this policy will arise where an employee is compelled by law to do so.

Providing any details of Aristocrat's confidential or sensitive information to parties outside Aristocrat without the necessary approval may result in legal action being taken against you by Aristocrat. If you leave Aristocrat, you are not permitted to take with you copies of computer programs, files or any other Company records.

Insider Trading

As a publicly listed company Aristocrat and its employees are subject to insider trading laws. "Inside information" is any information about Aristocrat that, if disclosed to the general public, could affect the decision of a shareholder or potential investor to buy, sell or hold Aristocrat shares. It is an offence to:

- receive personal gain from the use of inside information;
- pass on inside information to others for their personal gain;
- use information about another company obtained while working for Aristocrat to buy, sell or hold shares in that company; or
- pass on to others for their personal gain, information about Aristocrat or any other company obtained while working for Aristocrat.

Integrity at Work and Play

Insider Trading

The decision as to whether an employee is in possession of inside information is one to be made by the employee, not Aristocrat. Aristocrat's Share Trading Policy (which is available on the website) prohibits employees, contractors and consultants from dealing in Company securities if they are in possession of any inside information.

In addition, Designated Persons (Directors, the Executive Leadership Team, Extended Leadership Team and persons who by their role or otherwise, become aware of inside information by having access to confidential material) must not deal in the securities of the Company (and any derivative type product such as but not limited to puts, calls and warrants) during:

- the period between the end of Aristocrat's half-year trading period up to and including the day of the announcement of Aristocrat's half-year results;
- the period between the end of Aristocrat's full-year trading period up to and including the day of the announcement of Aristocrat's full-year results;
- the 21 calendar days up to and including the date of the Annual General Meeting; and
- any other period determined by the Board Chairman from time to time.

Before buying or selling Aristocrat shares you should contact the Company Secretariat for advice.

Refer to Global Policy EI.03 Share Trading Policy

Integrity at Work and Play

Dealings in Designated Entities

From time-to-time the Company may have dealings with certain entities, which could significantly influence the financial results of those entities and/or place employees in a position where there is a potential or perceived conflict of interest between their duties to the Company and their personal interests.

Where this is determined to be the case, an entity will be determined as a Designated Entity and will be included in the Dealings in Designated Entities Policy.

Designated Persons are prohibited from dealing in securities of any entity deemed to be a Designated Entity, or permitting, procuring or assisting anyone else to do so.

Refer to the Global Policy EI.30 Dealings in Designated Entities.



Integrity at Work and Play

Conflicts of Interest and Outside Employment

You must avoid conflicts between your personal interests and those of Aristocrat. If a personal interest influences the performance of your duties or creates the appearance of such influence then a conflict exists.

You must promptly disclose this type of personal interest to your local Compliance Officer.

The conflict may be avoided by eliminating this particular interest or by changing your duties at Aristocrat.

Integrity at Work and Play

Conflicts of Interest and Outside Employment

You should not be involved in outside employment or business activities if it:

- involves Aristocrat's customers, suppliers, agents, distributors or any other business associate;
- competes with Aristocrat services and customers;
- interferes with your Aristocrat duties;
- diminishes your ability to give your total effort to your Aristocrat duties;
- uses the facilities and property of Aristocrat such as computers, phones, photocopiers, and faxes; or
- creates an identification with, or perceived link to or support from Aristocrat.

Integrity at Work and Play

Conflicts of Interest and Outside Employment

Some examples of situations that constitute conflicts of interest include:

- owning over 5% in the business of one of Aristocrat's suppliers, competitors or customers;
- acting as a consultant, employee, officer or director for a supplier, competitor or customer;
- competing with, or aiding others in competing with Aristocrat in connection with the purchase or sale of its property or products;
- holding a position for remuneration or not or owning shares, in an organisation other than Aristocrat that is the holder of a gaming related licence such as a club or hotel;
- acting on behalf of Aristocrat in any transaction with any supplier, competitor or customer in which a relative is a principal, officer or representative;
- being involved in the employment process of a relative by Aristocrat;
- using Aristocrat's contractors or service providers (except utility providers) for personal use.

The above examples are not exhaustive, however are provided as a guide.

If you are unsure about being involved in outside employment or business activities or conflicts of interest, you should contact the Compliance Department immediately.

Refer to Global Policy EI.01 Conflicts of Interest

Integrity at Work and Play

Responsible Gaming

While Aristocrat does not impose restrictions on what its employees do in their leisure time, common sense must be used when playing Aristocrat gaming machines. Public perception of the good image of Aristocrat and its employees is paramount. If you are involved in the sale or service of Aristocrat's gaming machines, it is recommended you do not play those machines in your territory.

In some jurisdictions, the playing of gaming machines or gambling in any form is illegal for Aristocrat employees. You must familiarise yourself with the legislation pertaining to the environment in which you work.

Possession of Gaming Machines

Possession of a gaming machine including any component of a gaming machine such as artwork, Eproms, compact flash cards or any other sensitive component is restricted in most jurisdictions to those people holding a technicians licence. If you need to be in possession of any gaming machine or components and you do not hold a necessary licence, you must seek guidance from your local Compliance Manager.

Political Donations

In most jurisdictions in which Aristocrat operates it is illegal to make a political donation or contribution under gaming laws and under bribery and corruption legislation. For this reason, political donations or political contributions of any nature are strictly prohibited.

Unless your role at Aristocrat specifically requires you to be in contact with politicians or political parties, you must not engage in any communication without the prior approval of the Head of Corporate Affairs.

Refer to Global Policy TB.05 Dealing with Government Employees & Political Parties

Refer Global Policy TB.28 Anti-Bribery and Anti-Corruption.



Integrity at Work and Play

Community Commitments

Aristocrat encourages involvement of its employees in community projects through non-profit, charitable, social or sporting bodies where no real or perceived conflict of interest is apparent.

If you are unsure about being involved in community activities, you should contact the Compliance Department for advice.

Integrity at Work and Play

Expenses

Aristocrat will reimburse its employees for legitimate business expenses that are supported by original documentation including tax invoices. Aristocrat will not however, reimburse employees for any expenditure that falls outside the terms of the Global Travel Policy. You must familiarise yourself with this policy prior to committing the company to expenditure.

Please check your local operating procedures for details on how to claim expenses.

Refer to the Global Policy TB.21 Business, Travel and Entertainment.

Gifts and Entertainment

In your employment with Aristocrat you are not allowed to offer or accept gifts of more than A\$150 in value (or equivalent in local currency). Prior approval from your local Compliance Manager is required for exceeding this limit. In some jurisdictions, offering or accepting any gifts is illegal. You must familiarise yourself with the legislation pertaining to your work.

Providing entertainment to customers and suppliers is an acceptable business practice so long as it is within accepted ethical boundaries and its aim is to gain goodwill.

Providing gifts or entertainment to politicians and political parties or receiving gifts or entertainment from politicians or political parties is strictly prohibited.

Refer to Global Policy TB.06 Business Entertainment & Gifts

Refer to Global policy TB.28 Anti-Bribery & Anti-Corruption.

Integrity at Work and Play

Government Employees

Many countries have or are in the process of implementing legislation that aims to prevent acts of bribery aimed at influencing the behaviour of someone in government or business to obtain a commercial advantage. The penalties for failing to comply with legislation relating to acts of bribery are significant and can affect you as an employee and Aristocrat. The consequences can include:

- **Unlimited Fines and Penalties:** Aristocrat faces a considerable risk of being prosecuted and facing unlimited fines, as legislation is making it significantly easier for enforcement agencies to achieve convictions for bribery offenses.
- **Unlimited Individual Liability:** Individuals employed or engaged by Aristocrat who commit a bribery offense may in certain circumstances face unlimited fines and prison sentences.
- **Potentially Higher Penalties for Senior Executives:** Senior executives may in certain circumstances also face personal liability if an offense is committed with their consent, support, or by turning a “blind eye”.
- **Liability Attached to Third-Party Actions:** Aristocrat may also be held liable for the acts of associated third-parties, such as agents, distributors, and joint venture partners, irrespective of their location in the world.
- **Ongoing Operational and Reputational Costs:** Corruption-related allegations can result in time-consuming regulatory investigations, disrupt the business operations, and significantly damage both our corporate brand and regulatory reputation.

Integrity at Work and Play

Government Employees

Bribery

Bribery means knowingly giving or receiving, or agreeing to give or receive, an undue reward, whether financial or non-financial, to influence the behaviour of someone in government or business to obtain commercial advantage.

A bribe does not have to be actually given – the intent to give a bribe is sufficient to be deemed a bribe.

Acts of bribery are designed to influence individuals to act dishonestly while performing their job.

Bribes can take many different forms but typically both parties will benefit in some way. A bribe could be:

- The direct or indirect promise, offering, or authorisation, of anything of value (whether the value is material or not);
- The offer or receipt of any kickback, loan, fee reward or other advantage;
- or the giving of aid, donations or voting, all of which are designed to exert improper influence.

Acts of Bribery are Strictly Prohibited at Aristocrat.

Refer to Global Policy TB.05 Government Employees and Political Parties

Refer to Global Policy TB.28 Anti-Bribery & Anti-Corruption



Integrity at Work and Play

Government Employees

Corruption

Corruption is the willingness to act dishonestly in return for money or personal gain.

Corruption can occur when dealing both with commercial partners and government officials.

Acts of Corruption are Strictly Prohibited at Aristocrat.

Facilitation Payments

Facilitation payments are payments made to induce public officials to perform routine functions, such as issuing licenses or permits that they are otherwise obligated to perform, and constitute bribes under various laws.

Paying legally-required administrative fees or paying for fast-track services are not considered to be facilitation payments.

Facilitation Payments are Strictly Prohibited at Aristocrat.

Integrity at Work and Play

Government Employees

Business Entertainment and Gifts – Public Officials or Regulatory Authorities

Providing gifts and hospitality (meals, travel, entertainment) is often considered a form of courtesy and is common in everyday business in many countries. However, anti-corruption laws prohibit offering or providing anything of value, including gifts and hospitality, to a third party in order to obtain an improper advantage or otherwise unjustly influence official action. In addition, the acceptance of gifts and hospitality is specifically regulated in many countries because it is seen as one of the most obvious forms of bribery.

Particular concerns arise when such acceptance is in some way connected with a potential business transaction or regulatory approval. Generally, expenditures connected with government officials is considered to create a particular risk. Some countries may have laws that are even stricter than the Aristocrat's policies. If that is the case then the stricter rule applies.

Integrity at Work and Play

Government Employees

Business Entertainment and Gifts – Regulatory Authorities

Any gift or hospitality offered or provided must comply with the following:

- It is not offered to gain an improper advantage or influence official action.
- It is permitted by local law.
- The value is reasonable and appropriate to the recipient's position and circumstances and to the occasion so that it does not create an appearance of bad faith or impropriety and could not reasonably be misunderstood by the recipient or others as a bribe.
- The frequency of prior gifts or hospitality provided to the same recipient would not raise an appearance of impropriety.
- It is recorded fairly and accurately in Aristocrat records.
- If the recipient has direct or indirect decision-making responsibility over an anticipated or pending decision that will affect Aristocrat's interests then special caution must be exercised.

If you want to give a gift of more than nominal value, then pre-approval in writing is required from your local Compliance Manager.

If you want to give two or more gifts requiring pre-approval to the same recipient within six months, you will need the approval of your local Compliance Manager.

Integrity at Work and Play

Government Employees

Business Entertainment and Gifts – Regulatory authorities

In exceptional cases, such as spontaneous invitations occurring when an unplanned meeting takes place (e.g. at a trade fair or a third party organised conference) guests who are accompanying the invitee can be invited without pre-approval if it would be unacceptable to exclude them.

- If the proposed invitee has the power to influence a government or business decision, only modest meals that are connected to a necessary meeting or activity should be offered.
- Pre-approval in writing is required from your supervisor if the meal:
 - Has a value beyond that of an ordinary working meal under local or other applicable standards; or
 - Will include the spouse or guests of the invitee; or
 - Is not directly business-related.



Integrity at Work and Play

Government Employees

Business Entertainment and Gifts

It is not advisable to provide gifts (even of nominal value) to government officials more than once within a six month period.

Doing business over a meal is usual practice around the world. A meal may be offered to a third party without pre-approval if:

- the meal is business-related (takes place in the course of a meeting or another occasion, the purpose of which is to hold business discussions).
- The value is that of an ordinary working meal under local standards (expensive wines and delicacies are avoided).
- Business-related meals generally do not include the spouse or other guests of the invitee.

Integrity at Work and Play

Government Employees

Business Entertainment and Gifts – Regulatory Authorities

A second invitation to a government official for a meal requiring supervisor approval within a six months period requires pre-approval from your local Compliance Manager.

Invitations to entertainment events (for example, to attend plays, concerts or sporting events) tend to have limited direct relevance to business and therefore can create an appearance of impropriety. For that reason, entertainment invitations, other than for certain Aristocrat corporate events, require pre-approval from your local Compliance Manager.

Approval will normally be granted if all the following conditions are met:

- The proposed invitee has no decision-making authority over an anticipated or pending decision affecting Aristocrat's interests.
- The entertainment serves a legitimate business purpose.
- Black market or scalper's tickets are not used.
- Spouses or guests of the proposed invitee are not invited (unless in exceptional cases).

Refer to Global Policy TB.28 Anti-Bribery & Anti-Corruption.

Integrity at Work and Play

Sponsorship

Aristocrat is proud to support the community through sponsorship and charitable donations. Any requests of this nature must be directed to your local Sales and Marketing division who will review and determine if the contribution is relevant.

Any sponsorship payments or charitable contributions must only be made once a written request is received on formal letterhead and payment will be made to the requesting organisation. No third party payment requests will be considered or approved.

Refer to Global policy EI.31 Donations, Sponsorships & Charitable Contributions.

Integrity at Work and Play

Approval to Commit Aristocrat

Only authorised persons are able to commit Aristocrat to expenditure or contracts. If you are required to sign purchase requisitions, approve invoices or credit notes, sign cheques, offer payment discounts, set market prices or sign contracts committing the Company, you must do so only within the authority limits allowed.

Aristocrat maintains a Global Signature Authorisation Policy on the Intranet – you must check your signing authority before committing the Company to expenditure or contracts.

In addition, suppliers of services meeting certain criteria must undergo probity in accordance with Aristocrat's Global Suitability of Key Associates Policy - you should check this policy prior to committing the Company to any expenditure.

Refer to Global Policy TB.09 Claiming Expenses,

Refer to Global Policy TB.27 Contract Management

Refer to Global Policy FS001P3. Authorised Signatories.

Integrity at Work and Play

Export Declaration

Aristocrat requires full and accurate disclosure on all export documentation. Precise valuations and descriptions must be quoted on customs or similar declarations to achieve full compliance. This includes all products and parts shipped to customers and all products and parts shipped between our offices.

Our approach to disclosures on export documentation must be to meet the aims of the customs authority in the region receiving the goods.

Under no circumstances will Aristocrat be a party to arrangements such as low-value invoicing nor will we assist any customers to avoid their customs obligations.

Refer to Global Policy TB.15 Export Declarations.



Integrity at Work and Play

Carrying Items Across National Borders

You must not carry cash or goods across national borders in excess of local allowances. If you are unsure of what is permissible in countries you are travelling to, it is your responsibility to check with local authorities prior to travelling.

Refer to Global Policy TB.14 Carrying Declarable Items while travelling.

Copyright

There are strict laws in relation to copying published articles and works covered by copyright. You should not take or copy any records, files, designs, parts or products that belong to Aristocrat or any other person without the express approval from your local legal department. Both you and Aristocrat could be exposed to liability.

Security Identification

At all times you are on Aristocrat's premises you must wear your Security I.D. Card where such cards are issued and at all times this must be visible.

All visitors to Aristocrat's premises must be signed in with Security or Reception and a visitor's identification tag must be worn at all times.

Aristocrat Security Personnel have the authority to request to inspect any locker, bag or parcel, or area allocated to an employee at any time you are on Aristocrat premises, however, you do have the right to refuse such an inspection.

Safety Health and Welfare at Work

Aristocrat is committed to providing a safe and healthy work environment for all employees globally, and for those visitors and contractors at its premises. It is the intent of the Company to comply with all applicable safety and environmental laws and regulations wherever it operates.

Beyond complying with the law in all jurisdictions, Aristocrat will, in consultation with employees, implement a health and safety program that will reduce or eliminate the possibility of workplace injury and illness.

Your manager/supervisor is responsible for:

- the overall safety of employees, visitors, and contractors;
- Company property under their control;
- ensuring you are aware of who the first aid staff are near your work location;
- ensuring that all, regulatory requirements and policies and procedures are adhered to at all times; and
- ensuring contractors have complied with all Aristocrat OH&S policies and procedures.

As an employee you are responsible for your own personal safety and for the safety of others. Therefore, all employees must participate fully in Company health and safety programs and comply with all Company Occupational Health, Safety and Welfare policies and procedures.

In particular, you must report the following:-

- any close call, illness, injury, incident, hazard or dangerous occurrence that you are aware of; and
- any unsafe practices and/or faulty equipment, particularly with regard to safety guards and protection devices.

Safety Health and Welfare at Work

You are required to wear and maintain all protective equipment issued to you. If your safety equipment requires replacement it is your responsibility to report this to your manager.

As a contractor you must comply with all Aristocrat OH&S policies and procedures and in particular Aristocrat's contracting policies. This will include presenting job hazard identification, job safety analysis and work method statements prior to applying for a permit to work.

Aristocrat has active Health and Safety Committees, representing both employees and management, in each major work location / area. These Committees are responsible for ensuring local health and safety standards are met and maintained, and providing a voice on health and safety matters for all employees. The names of each location's Health and Safety committee members are posted in each major worksite.

Aristocrat has a comprehensive global Health and Safety Plan that is available on the Intranet site or in hard copy form at each location.

Trade Practices

There are various laws throughout the world that require Aristocrat to conduct open, fair and honest business dealings with its competitors, customers and suppliers.

In particular, Aristocrat will not:

- conduct business in a way that is likely to mislead or deceive its customers, regulators, or the wider Community;
- act in a manner in relation to commercial deals that uses its strong bargaining position against a weaker party;
- enter into any contract or arrangement which is likely to fix, control or maintain prices, discounts or credits for goods.

You must contact your local Legal Team if you are unsure of the requirements relating to fair trading.



A Final Word...

Operating in the gaming industry is like nothing you have ever experienced before: its fun, exciting, challenging, diverse, multi-cultural, and it can be very rewarding.

Operating in the gaming industry however, means that we must act with integrity at all times and our business decisions must not only be commercially sound but based on an ethical framework.

By answering yes to the question on the assessment page, you are acknowledging that you have read, understood and commit to complying with all aspects of this Handbook and Aristocrat's Global Policies and Procedures.

If ever you are in doubt about something – always ask, never assume!