



Code of Conduct

July 2026



Bringing joy to life through the power of **play**

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Aristocrat has grown from humble beginnings into a global entertainment and content powerhouse, powered by technology, and continually pushing boundaries to create world-leading gaming and mobile content. Since our founding in 1953, our business has grown significantly, expanding our global presence. Even as we have grown, we remain guided by our strong values and standards.

At Aristocrat, we understand that it is not just what we do, but also how we do it that matters. We pride ourselves on our 'People First' mindset which is embedded across our entire business, every day. This mindset starts with all employees, no matter their location, business unit or function, living by the robust principles and expectations we set for ourselves and each other. Our values go to the heart of what we stand for as a company. These core values guide everything we do, from empowering safer play and good governance, to diversity and inclusion.

It is these priorities, among many others, that help Aristocrat set new standards, as we progress on our journey of continuous improvement.

Our Code of Conduct (the Code) is more than just a 'read and forget' policy document. It outlines these

values and the standards of behaviour expected of our people across the globe. It sets out expectations for how we conduct ourselves, how we hold ourselves and others to account, and how we support our people to deliver for the business, shareholders, our people, our players, suppliers, and the community.

This code of conduct contains a "good decision-making tool" which should be used by all our employees as we make decisions everyday that impact our business, people or other stakeholders.

We have other People and Company policies that complement this Code, all of which can be found on the Policy Hub. Together this Code and all our policies provide a clear guide on the attitudes and principles we should all work and live by. We should all be proud to be part of a company that is founded on integrity, with a long history of ethical business practices.

I look forward to building on this strong legacy with you, as we continue to bring joy to life through the power of play for all our stakeholders, now and into the future. Regards,

Trevor Croker
Aristocrat CEO



Purpose of the Code

Each of us has a personal responsibility to follow the Code and ask questions if something doesn't feel right or doesn't reflect our values.



Each of us has a personal responsibility to follow the Code of Conduct (Code) and ask questions if something doesn't feel right or doesn't reflect our values.

This Code applies to all our people - including employees, senior executives, officers, non-executive directors, contractors and contingent workers, as well as business partners and other parties working on our behalf.

It is our guide to how we do things at Aristocrat. It sets out our company mission, values, the key commitments we've made and the standards, rules and behaviours we expect our people to follow. By understanding and upholding these requirements, we're contributing to better outcomes for our people, customers, players, shareholders and other stakeholders. In short, our Code is designed to safeguard our people and our business for the long-term benefit of all Aristocrat stakeholders.

By summarising important information in a Code of Conduct, our aim is to:

- Make it easier for our people to remember and comply with these vital requirements, and know where to go for more information or guidance;
- Encourage a shared understanding of our responsibilities and expectations of each other at Aristocrat; and
- Encourage our people to take action and speak up if they have concerns that this Code is not being upheld.



Not following the Code can have serious consequences for individuals and for our stakeholders and business.

A breach of the Code may result in personal consequences ranging from coaching and further training through to termination of employment or your engagement. So, take the time to ensure you're across what's expected of you, and don't hesitate to reach out if you have any questions at all. Your manager, and other colleagues, are here to help!

Expectations of the Code

Instilling a culture of acting lawfully, ethically and responsibly.



At Aristocrat, we are committed to promoting a culture across the organisation of acting lawfully, ethically and responsibly at all times. Our Code is designed to safeguard our people and our business.

This Code sets out our expectations for how our people work, support each other and our customers, and how we approach problems and make decisions.



Making Good Decisions

Use these questions to help you decide whether to proceed, pause, seek advice or escalate.

1. Can we do this?

- Is it lawful?
- Is it consistent with our policies and our Board-approved risk appetite?
- Could it create unacceptable legal, regulatory, player, safety, conduct or reputational risk?

2. Should we do this?

- Is it consistent with our values and commitments?
- Does it support good outcomes for our players, customers, people and communities?
- Would we be comfortable if this became public?
- Could we confidently explain this decision to regulators, customers, shareholders or the Board?

3. What else do we need to know?

- Who has the authority to make this decision?
- Do we need more information or expertise?
- Should we seek guidance, escalation or a second opinion before proceeding?

Understand the Code and related policies and comply with applicable laws.

- Familiarise yourself with the Code and relevant policies, understand the risks relevant to your role, risk appetite statements, and know where to seek guidance;
- Complete required training and awareness programs so that you are aware of your responsibilities and to support compliance with all policies, laws and regulations that apply to our operations globally.



Act ethically and with integrity

- Act in line with our values and in the best interests of Aristocrat at all times;
- Act honestly, ethically and with high standards of personal integrity;
- Treat our colleagues with respect and not engage in bullying, harassment or discrimination;
- Deal with customers and suppliers fairly;
- Do not engage in misleading, deceptive or anti-competitive conduct;
- Remain alert to suspicious, dishonest or misleading conduct;
- Support the accuracy and integrity of the information and reporting we prepare or share;
- Disclose and deal appropriately with any conflicts between your personal interests and your duties;
- Only give and receive gifts and hospitality in a way that is reasonable, transparent and consistent with our policies;
- Do not take advantage of your position, or of Aristocrat or its customer's property or information, for personal gain or to cause detriment to anyone;
- Speak up and seek guidance if something does not seem right or you are unsure what to do.

If you are a manager of people

- Lead by example and role model the behaviours and values expected under the Code;
- Support teams to apply policies, controls and good decision-making in practice and encourage them to ask questions.

***This Code will be reviewed by the Chief Legal Officer every two years or more frequently as required.**

Foundations of the Code

Anchored in our values and commitments

Bringing joy to life through the power of play





Our values distil the essence of Aristocrat.

They outline our commitments, define who we are and capture what we expect from everyone who works for and partners with us across the globe.

Our values should continue to inspire and challenge us every day. As a high-achieving, dynamic and creative organisation, we are continually looking for new ways to bring them to life.

All About the Player

We're obsessed with delivering great experiences, for our customers and for our player community.



PLAYER CONNECTED

Collective Brilliance

We're passionate about collaboration. With such a diverse business, we can learn so much from each other and achieve extraordinary things by working together.



OUR SHARED SUCCESS

Talent Unleashed

Our supportive culture equips our people with tools they need to do their best work and be rewarded for their achievements.



PEOPLE FIRST

Good Business Good Citizen

We strive to set new standards of responsibility in our industries, and we never lose sight of the long term.



BEST PRACTICE

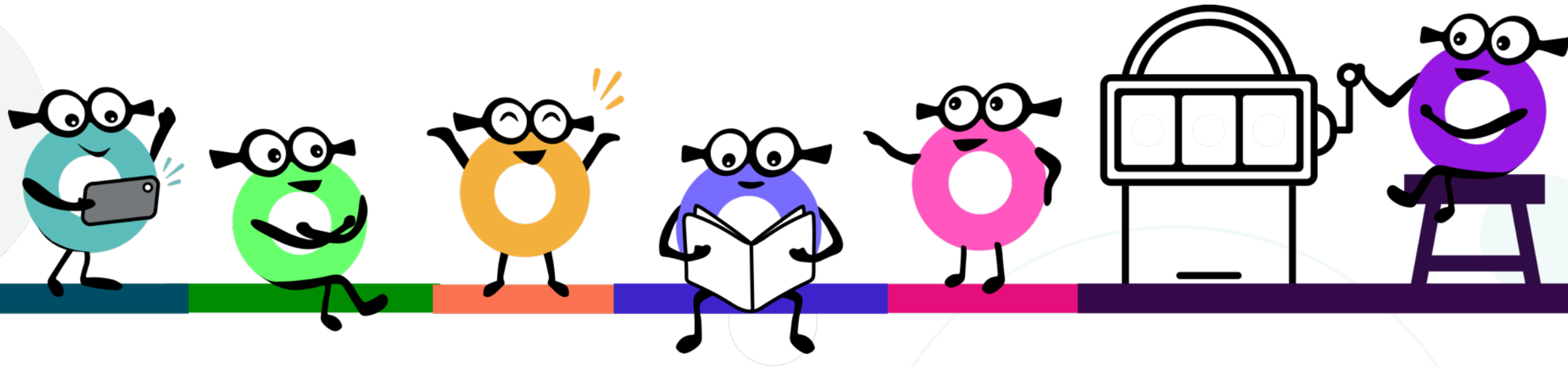
Complying with this Code includes upholding our Empowering Safer Play (ESP) framework and complying with the ESP policies, guidelines and training requirements that apply to your role.

ESP plays an important role in supporting player safety, meeting community and stakeholder expectations and managing legal, regulatory, consumer protection and reputational risks across our business.

Our approach to ESP is embedded across our global business. This includes our land-based gaming business (Aristocrat Gaming), our online real money gaming business (Aristocrat Interactive) and our free-to-play mobile game business (Product Madness).



EMPOWERING SAFER PLAY

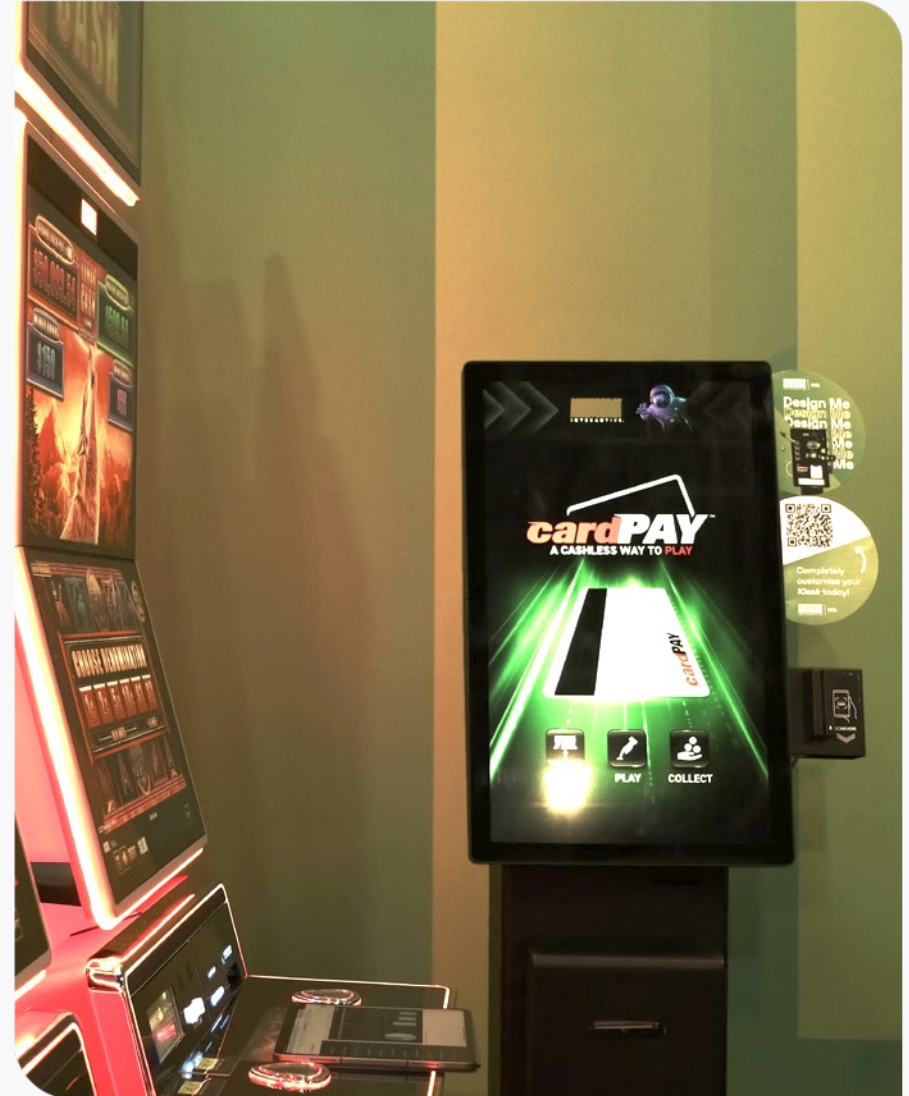




Comply

This means compliance with laws, regulations, license conditions, technical standards and platform rules relevant to ESP. This also means compliance with all applicable ESP policies, guidelines and mandatory training requirements. This includes requirements relating to data protection, privacy and platform rules for our social and digital games, and technical standards, licensing and game regulations for our regulated gaming products.

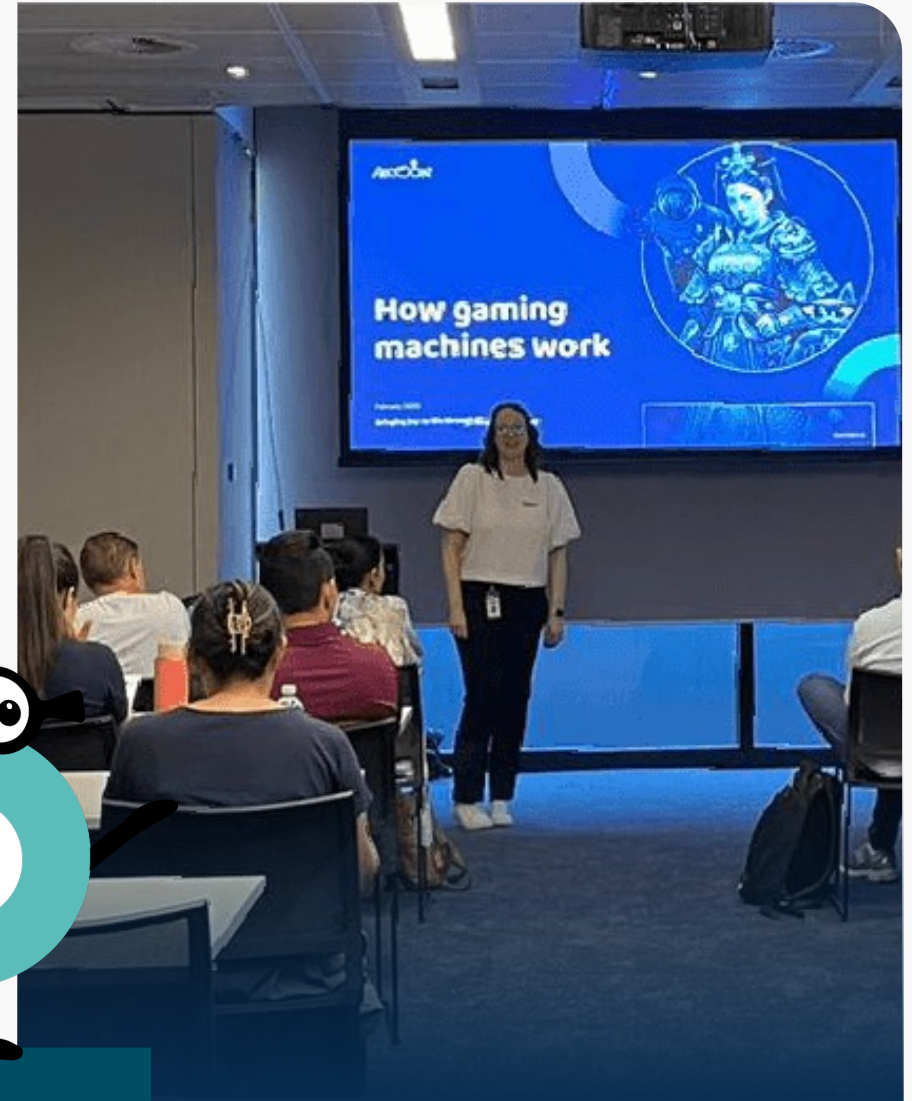
Aristocrat designs products in line with our values. Our games are designed to offer great entertainment experiences to a broad range of players. Product development across our business is robustly governed and informed by our ESP approach and applicable policies, which can be accessed on the Policy Hub.



Empower

Across our portfolio, we seek to educate and empower players and customers, because we believe player choice and empowerment are fundamental to satisfied customers and a vibrant, sustainable business and industry.

This includes delivering more training for our employees, providing players with clear information on how our games work, investing in developing and trialing ESP features with the support of our customers and providing tools, information and support options in areas where we have a direct relationship with players, including Product Madness and, where applicable, Aristocrat Interactive.



Improve

We are committed to continuously learning, improving and strengthening our approach to ESP. This includes regularly reviewing our ESP policies, practices and training; monitoring emerging research, regulatory developments and stakeholder expectations; and applying these insights to evolve our approach across our business.

We advocate for and adopt best-practice standards in our own business, invest in ESP product innovation, and contribute to research, education and harm-prevention initiatives in key markets to strengthen the evidence base and promote better understanding of ESP.

Through our membership of key industry associations, we encourage the industry to be open, informed and proactive in responding to community concerns about ESP.

In our regulated gaming businesses, we work with customers and industry partners to support and improve operator-led ESP initiatives, including by sharing insights, supporting practical tools and contributing to continuous improvement across the sector.





At Aristocrat, we understand and acknowledge that everyone is different, and unique attributes are encouraged and celebrated. We know being truly inclusive generates diversity of thought, which is fundamental to developing organisational capability and delivering strong business performance.

We are committed to creating a culture of inclusion, where we collaborate, everyone is treated with respect and dignity, and all employees experience a genuine sense of belonging and feel safe to do their best work. Bullying, harassment, discrimination and other inappropriate behaviour are not tolerated. These expectations are supported by our Global and Regional Policies relating to Anti-Discrimination, Harassment, Bullying, Violence and Retaliation.



We can all support diversity and inclusion at Aristocrat by:

Team Members	Value and respect the differences in others, contribute to an inclusive and respectful workplace, and speak up about behaviour that isn't consistent with our values or this Code.
Aristocrat Leaders	Role model and encourage behaviour consistent with our values and ways of working and contribute to continuous improvement in our culture, as well as actively balancing the needs of team members and the business when applying this Code. Help create an inclusive, respectful and accountable environment where people feel comfortable speaking up and doing their best work.
CEO & Executive Leadership Team	Responsible for our diversity and inclusion strategy: provide strategic guidance on its implementation, monitor progress, report to the Board and act as ambassadors to drive inclusion across the organisation.
Aristocrat Board	Attract and maintain a Board of Directors which has an appropriate mix of skills, experience and diversity; oversee the governance, review and assessment of measurable diversity and inclusion objectives, and verify progress towards the attainment of the objectives and the success of the overall strategy.



As a global business committed to ethical and responsible practices, we believe it is important that working conditions across all our operations and supply chains are safe, and that all workers are treated with respect and dignity.

We recognise that modern slavery, human trafficking and unethical practices are complex global problems that present risks to all businesses – including our own. We work to identify and address these issues across our business, and to achieve ongoing improvement, including through our Anti-Modern Slavery Program, supported by the Anti-Modern Slavery & Human Trafficking Policy on the Policy Hub.

Through our supplier due diligence processes, we seek to work with suppliers and business partners who reflect our values and support our environmental, social and ethical standards and commitments, including compliance with applicable laws, labour standards, health and safety requirements and responsible business practices, as set out in the Supplier Code of Conduct.

We work collaboratively with suppliers to promote responsible business practices and improve working conditions across our supply chains. We will continue to strengthen our approach through education, communication, monitoring, follow-up assessments and ongoing engagement, in line with our people-focused, risk-based approach.

We can all play a role

When working with suppliers, we stay informed, remain alert to concerns and raise issues where something does not seem right.

At Aristocrat 'Good Business, Good Citizen' is a core value that guides our global business in everything we do.

We consider privacy to be an important part of earning and maintaining the trust of our players, customers, employees, and business partners.

We are committed to handling personal information responsibly, ethically, and in accordance with applicable laws, regulations and our Global Privacy Policy and related documentation. By embedding privacy into the way we work, make decisions and develop products, we help promote a culture of accountability, respect and trust.

You can find a direct link to our *Data Privacy SharePoint page* at the back of the Code.

We also aim to use information and technology responsibly.

When using technology, we apply appropriate judgment, follow applicable controls and policies, and consider the potential impact on players, customers, employees and other stakeholders.

Refer to the *AI Usage Tools Guidelines* and other applicable policies on the Policy Hub for additional guidance.



We all play a role in protecting our company's systems, platforms, games, applications, infrastructure, and data.

This means understanding and following applicable security requirements and acting responsibly to help safeguard our business, players, customers, and partners from cyber and information security risks.

Refer to the *Global Information Security Policy* on the Policy Hub for detailed requirements and guidance.

We protect confidential information, including Intellectual Property, and do not improperly share or use information belonging to Aristocrat, our customers, suppliers or previous employers.

Refer to the *Global Intellectual Property Policy* on the Policy Hub for additional guidance.



Our approach to Health, Safety and Environment (HSE) is one of continuous improvement through establishing measurable objectives and targets and consistently improving our Global HSE Management System with the aim to eliminate, so far as is reasonably practicable, or mitigate incidents and injuries within our workplace, extending to customer sites where we operate. This approach is supported by our Global Health, Safety and Environment Policy.

To achieve this, we are passionate about continually enhancing the skills, knowledge, and commitment of our workforce through task and location specific HSE training, supported by guidance and resources such as Safety Standdowns and Toolbox Topics. We also actively engage with workers, relevant suppliers and customers on HSE matters to promote a strong and positive safety culture.

Aristocrat has designed 9 HSE Core Behaviours that set a clear expectation for how we work safely and responsibly, helping to prevent serious injuries, incidents and adverse environmental impacts across our operations and facilities.

Our aim is:

- For our safety behaviours to encourage employees to engage in safe work practices
- Not participate in risky or unsafe behaviour
- To promote a positive safety culture



Breaches of these behaviours will be managed on an individual basis.

9 Core HSE Behaviours

1

Wellbeing

ALL EMPLOYEES

2

Ergonomics

ALL EMPLOYEES

3

Incident Report

ALL EMPLOYEES

4

Equipment & Machinery Safety

ALL EMPLOYEES

5

Driving Safety

ALL INTEGRATION CENTRE & FIELD SERVICE EMPLOYEES

6

Electrical Safety

ALL INTEGRATION CENTRE & FIELD SERVICE EMPLOYEES

7

Material Handling & Powered Industrial Vehicle Safety

ALL INTEGRATION CENTRE & FIELD SERVICE EMPLOYEES

8

Hazard Recognition & Stop Work Authority

ALL INTEGRATION CENTRE & FIELD SERVICE EMPLOYEES

9

Pollution Prevention

ALL INTEGRATION CENTRE & FIELD SERVICE EMPLOYEES

Speaking Up

Aristocrat is committed to an environment where open, honest communications are the expectation, not the exception.





It's right there in our values - where our commitment to 'Good Business, Good Citizen' represents the way we strive to set new standards of responsibility in the industries and communities that we operate in.

To this end, Aristocrat maintains a comprehensive listening strategy to encourage you to share your feedback, questions, and concerns. This includes employee Pulse surveys, regular Q&A opportunities with Business Unit or Functional leaders, and periodic reviews and ongoing discussions with your manager.

If you see something that doesn't seem quite right, or may conflict with the Code, please speak to your manager, your local People & Culture Business Partner or another leader in the business. They are all available to listen and help determine the appropriate response based on the issue.

A key component in this listening strategy is our Whistleblower Program, which is built to help identify and address any instances of corruption, illegal or other undesirable conduct. Our Global Whistleblower Policy provides further details on the protections and processes available to those who report their concerns.

If you come across a potentially serious matter, we encourage you to speak with someone or to report your concerns via the EthicsPoint portal.

The EthicsPoint portal is operated by a third party, independent of Aristocrat, and offers a secure, anonymous way to raise your concerns. It is accessible globally, 24 hours a day, 7 days a week and protections are provided to people using the program. **You can find the link to the portal at the back of this Code.**

Group Policies

Aristocrat's policies work alongside the Code by providing more detailed guidance for specific areas of the business and communicating the company's values and expectations of employee behaviours and performance during both work and play.

Our policies support the way we operate, make decisions and manage risk across Aristocrat. They help guide responsible business practices, operational resilience, financial accountability and compliance with our legal and regulatory obligations globally.

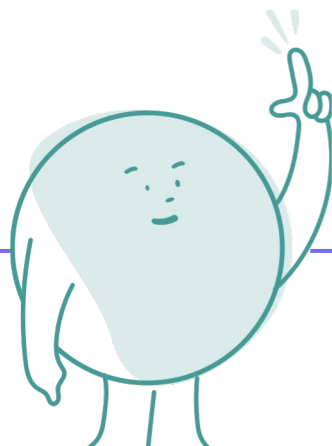


Our Governance

We consider our Governance policies to be some of our most important policies, as they provide a clear framework for decision-making and accountability within the company. Furthermore, they help to ensure that the company is operating in a transparent and ethical manner, which we believe helps build trust and confidence among our employees and all stakeholders.

Key Governance Policies

- Anti-Bribery & Anti-Corruption Policy
- Conflicts of Interest Policy
- Diversity & Inclusion Policy
- Global Information Security Acceptable Use Policy
- Global Whistleblower Policy
- Global Health, Safety & Environment Policy
- Media & Market Engagement Policy
- Risk Management Policy
- Share Trading Policy
- Suitability of Key Associates Policy
- Continuous Disclosure Policy



Our Legal

Our Legal policies set out the legal responsibilities and support responsible business practices both in regulated and non-regulated environments across our global operations.

Key Legal Policies

- Anti-Money Laundering Policy and appendices
- AI Usage Tools Guidelines
- Contract Management Policy
- Dealing with Government Officials & Political Parties Policy
- Global Document Management and Retention Policy
- Global Privacy Policy
- Nevada Gaming Control Board Compliance Plan
- Regulatory Compliance Policy



Our Business

Ours is a resilient and diverse business. Our passion for creativity, innovation and collaboration is fuelled by our mission to bring joy to life through the power of play.

Key Business Policies & related Documents

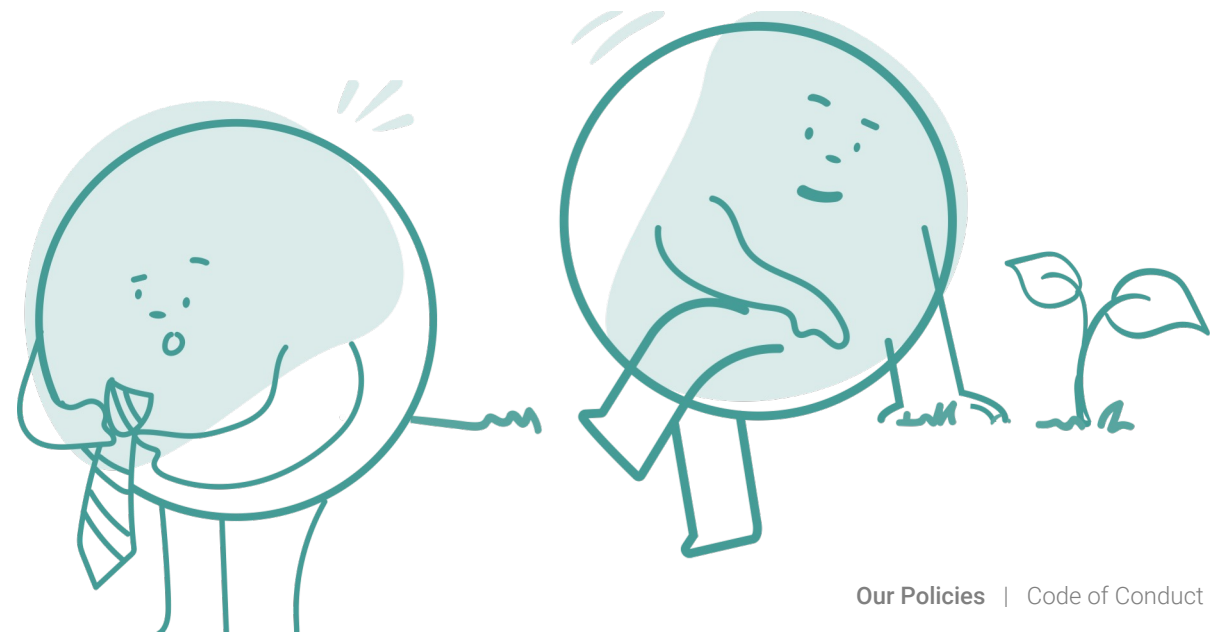
- Anti-Modern Slavery & Human Trafficking Policy
- Corporate Credit Card Policy
- Crisis and Incident Management Guide
- Donations, Sponsorship and Charitable Contributions Policy
- Emergency Mass Notification Policy
- Fraud Control Responsibilities Policy
- Global Business Resilience Policy
- Global Empowering Safer Play Policy
- Global Financial Authorisation Limit & Contract Signing Policy
- Global Trade Compliance Policy
- Global Travel Entertainment and Expense Policy and Travel Insurance Information for all Employees
- Global Third-Party Risk Management Policy
- Product Madness ESP Policy
- Regulated Gaming ESP Policy

Our Products

With our shared values, we're committed to becoming a better business, every day and helping deliver products that provides great performance and enjoyment for customers and players.

Key Product Policies & related Documentation

- Global Intellectual Property Policy
- Product Development Charter for Regulated Gaming Markets





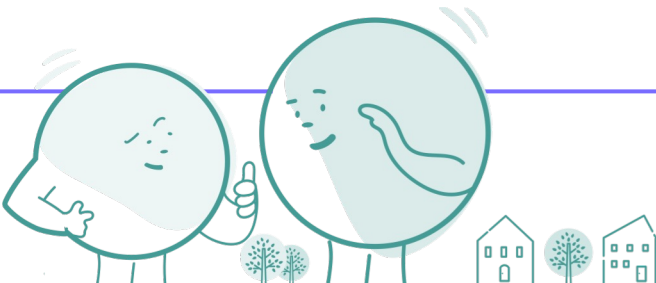
Our People

Our employees are the beating heart of our business and the reason we are an industry leader. We want you to feel supported and rewarded for what you do, but also make sure we give you the information, resources and support to thrive and be your best at Aristocrat.

Our global and regional policies help guide the way we work across different parts of the business and in the jurisdictions that we operate.

Key Business Policies & related Documents

- Alcohol, Drugs and the Workplace
- Compliance Training Policy
- Employee Gambling Policy
- Global Employee Referral Program
- Family & Domestic Violence Policy
- Global Flex Work Policy
- Gambling at Crown Resorts Policy
- Global Internal Mobility Policy
- Global Relocation Policy
- Global Remuneration Policy
- Global Anti-Discrimination, Harassment, Bullying, Violence & Retaliation Policy
- Regional Anti-Discrimination, Harassment, Bullying, Violence & Retaliation Policies
- Injury Management Policy
- International Assignment Policy
- Mobile Device Policy
- Global Security of Aristocrat Assets Policy
- Service & Celebration Benefits Policy



Guidance, Resources & Support





View the Supplier Code of Conduct [here](#)

View the Anti-Modern Slavery Statement [here](#)

View the Sustainability Report (FY25) [here](#)

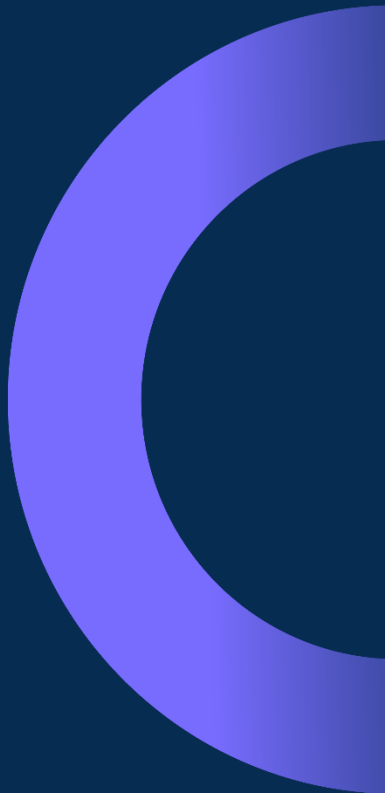


ARISTOCRAT

ARISTOCRAT GAMING



PRODUCT
MADNESS



ARISTOCRAT
INTERACTIVE