

# Supplier Code of Conduct

FY2025



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Across Aristocrat's global enterprise our core values guide everything we do, including through our sourcing program:

- **All About the Player**  
We put the player at the heart of every decision, and we want our partners to share this commitment to excellence and integrity.
- **Talent Unleashed**  
We believe in empowering people to do their best work, and we extend this belief to our suppliers by fostering innovation and mutual growth.
- **Collective Brilliance**  
We know that the best outcomes come from working together, and we celebrate the diverse strengths of our global supply chain.
- **Good Business, Good Citizen**  
We are committed to ethical practices, sustainability, and making a positive impact in the communities where we operate.

Our Supplier Code of Conduct reflects these values. It is not just a document – it is a shared commitment to uphold the highest standards of ethics, responsibility, and excellence across our global supply chain. Together, our reach is mighty, and our impact can be profound.

In recent years, we have faced unprecedented challenges – from global pandemics to rapid technology transformation. In this increasingly complex yet connected world, our partnerships have become more vital than ever. We are grateful for the opportunity to learn and grow together, and we deeply value the trust and collaboration that define our supplier relationships.

Thank you for your ongoing partnership and support across the years, your resilience, adaptability, and commitment have been instrumental to our shared success.

Together, we have evolved the sourcing environment – not only focusing on quotes and cost, but also embracing broader priorities such as risk management, regulatory and compliance initiatives, and the development of supplier programs rooted in ethical sourcing and collective brilliance. These enhancements reflect our deeper belief in doing business the right way: making the world a better place, being exceptional partners, and fostering collaborative, long-term relationships.

Thank you for your continued support, your adaptability, and your dedication to building a brighter future with us.

**Ivan Jileta**

**Vice President, Global Strategic Sourcing**



## Introduction

Aristocrat Leisure Limited and its affiliates (collectively, 'Aristocrat Group' or 'we') are committed to fostering safe working conditions in Aristocrat Group's operations and in its supply chains, treating all workers across the globe with respect and dignity, and building and supporting business operations that 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, Canada and the United Kingdom, the Responsible Business Alliance Code of Conduct and other international standards; the core labour standards of the International Labour Organization (ILO), including the elimination of forced labour, child labour, discrimination, and the right to freedom of association; and the United Nations Guiding Principles on Business and Human Rights (UNGPs).

We expect all Suppliers to 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 working conditions through communications, training, monitoring and follow-up assessments, and we expect Suppliers to cooperate with us 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 or any contract between an Aristocrat Group entity and a Supplier imposes stricter or more detailed requirements than the Supplier Code, we expect Suppliers to meet the stricter or more detailed 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 and contract workers, 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 ('UNGPs') which are the recognised global standard for preventing and addressing business-related human rights harm.

The labour standards are as follows:

### **Freely Chosen Employment: Prohibition of Modern Slavery and Human Trafficking**

Suppliers must not use, or permit by their suppliers or in their supply chains, 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 working arrangements must be entered into voluntarily and all workers, including student interns, must be free to 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, Immigration Law and Compliance**

As part of the hiring process, Suppliers must provide workers with a written employment agreement in their native language that contains a description of the terms and conditions of employment. For workers recruited outside the Suppliers' country of operations, 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 comply with any applicable laws or regulations in their country of operation regarding terms and conditions of employment. In addition, Suppliers must not require workers 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 workers.

Suppliers must employ or retain all of their workers, including migrant and foreign workers, full compliance with applicable immigration and labour laws.



## **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 not employ any workers below that age, 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 of other entry-level workers performing equivalent tasks. Suppliers are responsible for the 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 education partners, and protection of participants' rights in accordance with applicable laws and regulations.

## **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, even if applicable laws in the countries of employment continue to permit work hours in excess of this limit. Suppliers must provide workers at least one day off every seven days.

## **Wages and Benefits**

Compensation paid by Suppliers to workers must comply 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 other than voluntary and paid overtime. 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. Suppliers must not permit deduction 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.



## **Non-Discrimination, Anti-Harassment and Abuse**

Suppliers shall be committed to a workplace free of harassment, abuse and unlawful discrimination, and shall 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 wage, benefits, promotions, rewards, and access to training. In addition, Suppliers shall not subject workers or potential workers to medical tests or physical examinations that could be used in a discriminatory way.

Suppliers shall not threaten workers with, or subject them to, harsh or inhumane treatment, including but not limited to verbal abuse and harassment, psychological harassment, mental and physical coercion and sexual harassment. All employees should be treated with dignity and respect and be provided with a safe and supportive work environment. Supplier must provide workers with an effective mechanism to report grievances and that facilitates open communication between management and workers.

## **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 organisations, 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.



# Health Standards

Supplier Code Of Conduct





## Health 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 and Safety Management System

Suppliers must have an implemented and functioning Health & Safety Management System. 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 workers' 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 and well-maintained personal protective equipment. Suppliers must not discipline or take any retaliatory measures against workers for raising safety concerns in good faith.

### Occupational Injury, Illness and Incident Management

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.

Suppliers must have a system in place for workers to report health and safety incidents and near-misses. This system shall include mechanisms to investigate, track, and manage such reports. Suppliers must implement corrective action plans to mitigate risks, provide necessary medical treatment, and facilitate workers' return to work. Aristocrat Group encourages regular review and update to the incident management system to ensure its effectiveness. Suppliers must provide training to workers on how to report incidents and near-misses.



## **Emergency Preparedness**

Suppliers must identify and assess potential emergency situations. For each situation, Suppliers must develop and implement emergency plans and response procedures that will minimise harm to life, environment, and property. Potential emergency situations and events must be identified and assessed, and their impact minimised by implementing emergency plans and response procedures, including emergency reporting, employee notification and evacuation procedures, worker training, and drills. Emergency drills must be executed at least annually or as required by law, whichever is more stringent. Emergency plans must also include appropriate fire detection and suppression equipment, clear and unobstructed egress, adequate exit facilities, contact information for emergency responders, and recovery plans. Suppliers must regularly review and update emergency plans and response procedures to ensure their effectiveness.

## **Industrial Hygiene**

Suppliers must identify, evaluate, monitor and control workers' exposure to chemical, biological and physical agents. Suppliers must use engineering or administrative controls to control exposures. When Suppliers cannot adequately control these hazards by such means, Suppliers must protect 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 workers' 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 regularly 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 provided by Suppliers must be clean, safe and provided with appropriate emergency egress, hot water for bathing and showering, adequate lighting, heat and ventilation, regular pest management and reasonable personal space and entry and exit privileges.



## Environmental Standards

As part of its compliance program, Aristocrat Group is committed to integrating social, environmental and ethical sourcing practices 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 characterize, 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 characterize, 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 Substance Restrictions**

Suppliers must not use prohibited or restricted substances in manufacturing components supplied to Aristocrat Group and must adhere to all applicable laws, regulations and Aristocrat Group requirements, including labelling for recycling and disposal.

## **Resource Efficiency**

Suppliers must work to reduce consumption of resources, including raw materials, energy and water, throughout all aspects of the product lifecycle and in all operations (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. 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.



# Emissions Reduction

Supplier Code Of Conduct





## GHG Emissions Reduction: Targets, Measurement and Reporting

Aristocrat Group is committed to a 1.5°C climate future and has set near and long-term science-based targets for Scope 1, 2, and 3 Greenhouse Gas (GHG) emissions. To achieve its targets, Aristocrat Group seeks to partner with suppliers who share a common commitment to reducing GHG emissions, driving collective progress and strengthening emissions reduction efforts. Aristocrat Group expects Suppliers to:

- Set GHG emissions reduction targets: Suppliers must provide documentary evidence to Aristocrat Group demonstrating *either* their commitment to establishing GHG emission reduction targets or a description of their existing targets. At a minimum, targets must cover Scope 1 and 2 emissions.
- Measure and track GHG emissions: Suppliers must take steps to measure and track GHG emissions in line with the GHG Protocol.
- Report on GHG emissions: On request, Suppliers must be able to provide documentary evidence of their GHG emissions and evidence of reduction efforts for the most current 12-month period.
- Understand material climate-related risks and opportunities: Suppliers should identify the climate-related risks and opportunities that could reasonably be expected to affect their business.



# Ethical Standards

Supplier Code Of Conduct





## 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 the 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.

### **Anti-Bribery & Anti-Corruption Laws**

Aristocrat Group does not tolerate acts of bribery or corruption, kickbacks, or extortion. Our zero-tolerance stance on bribery is essential to supporting communities affected by corruption. Suppliers must comply with anti-bribery and corruption laws, directives, and regulations, including the UK Bribery Act, the USA Foreign Corrupt Practices Act and Anti-Kickback Statute, and the Australian Criminal Code Act 1995 (Cth). Suppliers must conduct due diligence to prevent and detect bribery and corruption in all business arrangements, including partnerships, contractors, sub-contractors, joint ventures, offset agreements, and third-party intermediaries.

Suppliers must never knowingly give or receive, or agree to give or receive, an undue reward, whether financial or non-financial, to influence the behaviour of someone in government or business either in their personal or official capacity, to obtain a commercial or personal advantage. This prohibition applies even in locations where such activity may not violate local law or customs.

Some jurisdictions allow "facilitation" or "grease" payments intended to expedite or secure the performance of routine governmental actions; however, facilitation payments to further the interests of Aristocrat Group or the Supplier are prohibited.

Suppliers must maintain and enforce adequate policies, procedures, internal controls, and training to ensure compliance with anti-bribery and anti-corruption laws. Suppliers must fully cooperate with Aristocrat Group in evaluating program effectiveness.

### **Conflict of Interest**

Suppliers must inform Aristocrat Group of any potential conflict of interest, whether actual or perceived, arising from personal, professional, or financial relationships with a supplier, competitor, customer, regulators, or any other party that Suppliers know conducts business with Aristocrat Group. For example, potential conflicts of interest arise in situations where a relative or close associate holds a key decision-making role with a supplier, competitor, or customer of Aristocrat Group or the Supplier and could be perceived to make a decision that results in an undue reward.



Perceived and actual conflict of interest situations should be avoided whenever possible. Suppliers must have a system in place to disclose or report all conflicts of interest during onboarding or promptly when a potential conflict situation arises. Suppliers must develop training, decision flowcharts, and other materials to help identify, prevent, report, and manage conflicts of interest. Suppliers are encouraged to appoint an ethics officer to assist in decisions surrounding all conflicts of interest.

### **Gifts or Business Courtesies**

Aristocrat Group expects suppliers to compete based on the merits of their products and services. Suppliers must not use business courtesies to gain an unfair competitive advantage. Any gift or business courtesy must comply with applicable local laws and regulations, must not violate the recipient's organisation's rules, and must be reasonable in value, non-extravagant, and linked to a business purpose. Giving or receiving cash and cash equivalents is prohibited.

Suppliers should use good judgment when exchanging business courtesies. Lavish or non-transparent gifts, meals, entertainment, hospitality, and travel may be perceived as bribes, may create conflicts of interest, or may be seen as attempts to improperly influence decisions. Provision of business courtesies to Aristocrat Group employees, if allowed, should be reasonable in value, infrequent, and linked to a business purpose.

### **Fraud and Deception**

Suppliers must not engage in fraud, deception, or misleading conduct, nor allow others to do so on their behalf. Suppliers are expected to act with integrity and transparency in all dealings with Aristocrat Group, government or regulatory authorities, and Aristocrat Group's customers. If a false or misleading statement or material omission is discovered, Suppliers must promptly correct it with accurate information. These obligations apply to all aspects of the Suppliers' business, especially those related to the operation, quality, safety, or regulatory compliance of their products or services.

### **Insider Trading**

Suppliers and their personnel must not use any material or non-public information obtained through their business relationship with Aristocrat Group for trading or enabling others to trade in the securities of any company. Insider trading is prohibited. Suppliers must not buy or sell securities when they possess information about Aristocrat Group or another company that is (1) not available to the public and (2) could influence an investor's decision to buy or sell the security. Suppliers must regularly review and update policies and procedures to comply with insider trading laws. Suppliers must provide training to employees on identifying and avoiding insider trading.

### **Adequate 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 and Artificial Intelligence (AI)

Suppliers must respect intellectual property rights and conduct the transfer of technology and know-how in a manner that protects intellectual property rights and preserves the confidentiality of Aristocrat Group information.

Suppliers must develop and deploy AI systems ethically and responsibly. Suppliers must ensure fairness, transparency, and data privacy while actively avoiding bias and discrimination. AI systems should be understandable, with clear information on their operation, and must include human oversight to enable intervention when needed. Suppliers are expected to comply with all relevant laws and regulations to continuously improve their AI practices. By adhering to these principles, suppliers help ensure AI is used in a way that promotes human well-being and upholds our commitment to ethical innovation.

Suppliers should assume that any information provided to an externally hosted, web-based or third-party supplied AI tool, and all interactions with the tool, will become public information. Interactions with an AI tool are often recorded, analysed, and used as the basis for training the AI tool. Information submitted to the tool could also be used to generate outputs for other users in the AI tool, including confidential information, non-public information, personal data and intellectual property rights of others.

For these reasons, Suppliers are prohibited from submitting any Aristocrat Group data, information or content (text prompts, uploaded files, images, records, etc.) to AI tools where the supplied information or query results have any risk of being adapted, retained and/or incorporated into a large model, or where there is a risk of data being exposed or provided by the AI tool to another user in response to a subsequent query or request.

Suppliers are also prohibited from submitting any information, data, or content relating to Aristocrat Group or Aristocrat Group personnel, customers or business partners into any public, third-party, or web-facing generative AI application (including, but not limited to Deep Seek, Dall-E, ChatGPT, Bard and Gemini) without advance written permission from Aristocrat Group. Suppliers should note that this prohibition is not intended to prohibit the use of internal and contained instances of generative AI, such as Microsoft CoPilot or private Chat GPT instances that do not share content or results with users outside the Supplier's user network.

## Fair Business, Advertising and Competition

Suppliers must comply with all applicable local 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 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.

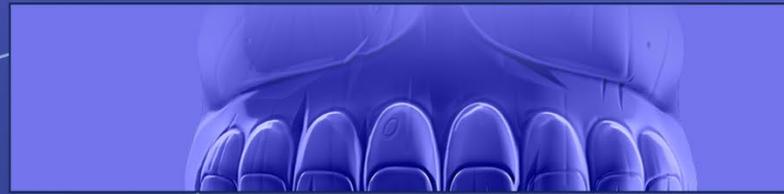
### **Privacy and Data Protection**

Suppliers must prioritise the privacy and security of all data they handle. Suppliers must comply with applicable data protection laws and regulations, ensuring that personal and sensitive information is collected, stored, and processed securely. They must implement measures to prevent unauthorised access, maintain transparency in data usage, and obtain proper consent where necessary. Suppliers should also regularly assess and update their data protection practices to address evolving risks and ensure the continued safety and privacy of data. By adhering to these principles, Suppliers safeguard the rights of individuals and support our commitment to privacy and security.



# Management Systems

Supplier Code Of Conduct





## 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 to 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.

### Risk Assessment and Risk Management

Suppliers should periodically conduct a risk assessment or similar process to identify, monitor and understand the environmental, health and safety, labour standards, and ethics risks associated with their operations, including the requirements of this Supplier Code. 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. A risk management approach in accordance with ISO 9001 or equivalent would be highly regarded.

### 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-Tier Suppliers

Suppliers are expected to adopt and implement appropriate measures which should include due diligence procedures, contractual standards, training and communications, onsite audits, monitoring, reporting and



remediation mechanisms to ensure that any of their own sub-tier 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. Suppliers should use their best efforts to cascade this obligation to their second and third tier suppliers.

### **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 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. This may include 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.

## **Supply Chain Risk and Business Continuity**

Suppliers are expected to assess and manage risks that could affect the continuity, quality, or compliance of goods or services provided to Aristocrat Group. This includes risks related to natural disasters, conflict, cyber incidents, single-sourcing, and sub tier supplier disruptions. Direct suppliers of goods must maintain accurate and current records of the sub-tier suppliers involved in the provision of materials, parts, or components to Aristocrat Group. Upon request, Suppliers must disclose the identity, location and relevant risk profile of tier two, and, where applicable, tier three suppliers, particularly where parts or components are critical to supply continuity, single-sourced or originate from high-risk geographies. Suppliers must assess and monitor sub tier risk that could impact their ability to supply Aristocrat Group. To support Aristocrat Group's risk management processes, Suppliers may also be asked to participate in reasonable sub-tier mapping, disclosure exercises or data sharing through approved risk platforms or tools. Suppliers must maintain documented business continuity and disaster recovery plans appropriate to the nature and criticality of goods and services provided to Aristocrat Group. These plans must account for relevant operational risks, including disasters, conflict, and supply interruptions. Upon request by Aristocrat Group, Suppliers must provide a current copy of their business continuity plan and, where applicable, relevant sub-tier dependencies and estimated time to recover (TTR) for critical goods and services to support Aristocrat Group's supply chain risk assessment processes.

## **Whistleblower Policy**

As part of Aristocrat Group's ongoing commitment to maintaining the highest standards of integrity and transparency, we have an established Global Whistleblower Policy. This policy is designed to encourage individuals to report any unethical or illegal activities within our operations and supply chains, and outlines the protections available.

Key Points of the Global Whistleblower Policy:

- 1. Confidential Reporting**  
Individuals can report concerns anonymously and confidentially.
- 2. Protection Against Retaliation**  
Aristocrat Group prohibits retaliation against individuals who report concerns in good faith. Please refer to Section 8 of our Global Whistleblower Policy.
- 3. Investigation Process**  
All reports will be assessed by Aristocrat Group to determine whether a formal investigation is necessary. Please refer to Section 7 of our Global Whistleblower Policy.
- 4. Reporting Channels**  
Concerns can be reported via our dedicated whistleblower hotline or through our secure online portal. The whistleblower hotline can be used according to the country specific phone numbers.



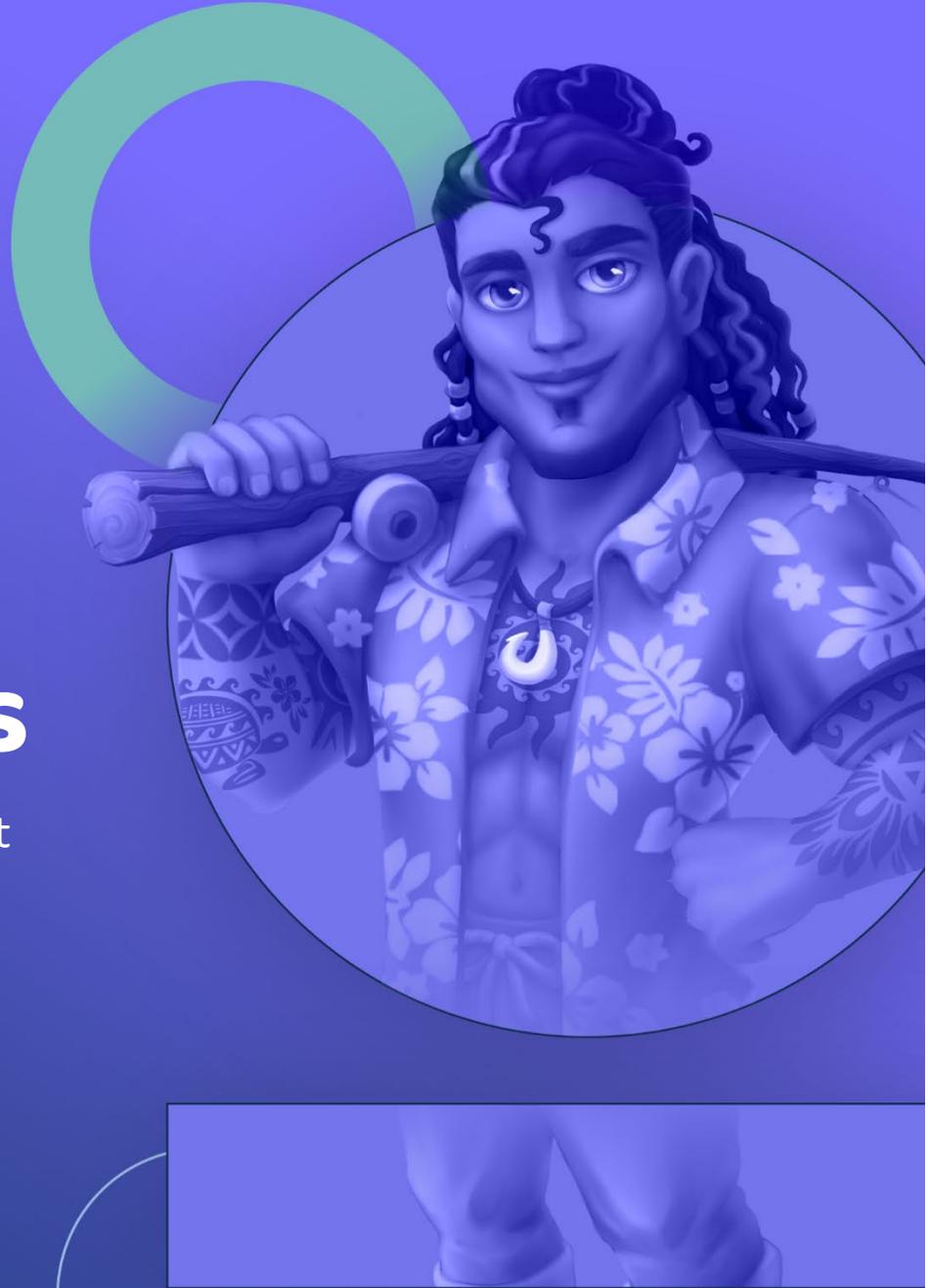
Our dedicated EthicsPoint phone hotline numbers can be found in our Global Whistleblower Policy. Our EthicsPoint website can be found at [www.aristocrat.ethicspoint.com](http://www.aristocrat.ethicspoint.com).

The Ethics Point global service is available 24 hours a day, 7 days a week and can be accessed online or by phone. Any grievances, including those relating to modern slavery issues, can be raised through this channel or directly to certain senior management across Aristocrat Group. Aristocrat Group encourages Suppliers to share the relevant EthicsPoint phone hotline numbers and website with their employees and workers so that they can access the service.



# Labour Standards

Supplier Code Of Conduct





## References

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

- Aristocrat Anti-Bribery & Anti-Corruption, Third Party Entertainment and Gifts Policy [f7a2ebed-148c-4798-9858-48f549c60809](#)
- Aristocrat Global Whistleblower Policy [\[CONSOLIDATED\] HSF Edits - Global Whistleblower Policy](#)
- Aristocrat Supplier Code of Conduct [2950b987-7a78-4e73-ac37-06422ca0d94f](#)
- Dodd-Frank Wall Street Reform and Consumer Protection Act [The Dodd-Frank Wall Street Reform and Consumer Protection Act: Background and Summary | Congress.gov | Library of Congress](#)
- Responsible Business Alliance Code of [Conduct Code of Conduct](#)
- Ethical Trading Initiative [Home | Ethical Trading Initiative](#)
- ILO Code of Practice in Safety and Health [ILO Codes of practice and guidance documents | International Labour Organization](#)
- ILO International Labour Standards [International Labour Standards | International Labour Organization](#)
- ISO 14001 [ISO 14001:2015 - ISO 14001 - Environmental management systems](#)
- OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas [OECD Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas | OECD](#)
- OECD Guidelines for Multinational Enterprises [OECD Guidelines for Multinational Enterprises on Responsible Business Conduct | OECD](#)
- AS/NZS 4801 [What is a AS/NZS 4801 Safety Management System and the Benefits](#)
- SIA/SA 8000 [SA8000® Standard - SAI](#)
- ISO 9001:2015 Quality management systems - Requirements



## Easy Guide to Requirements

While detailed provisions are documented in the Supplier Code of Conduct, the following table provides a non-exhaustive summary of the requirements of this Supplier Code.

Standard	Provision
Labour	Freely chosen employment & prohibition of modern slavery
	Written employment agreements
	Child labour prohibited
	Working hours not to exceed maximum set by local law
	Workforce free from harassment, abuse of discrimination
	Freedom to associate freely and collectively bargain
	Fair treatment of migrant and foreign workers
Health Standards	Health & Safety Management System
	Non exposure to potential safety hazards
	Procedures to prevent, track and report occupational injury and illness including safety incidents and near misses
	Emergency preparedness procedures
	Processes for physically demanding work
	Regular evaluation of machinery
	Provision of clean toilet facilities, drinking water and sanitary food preparation
Environment	Environment Management System
	Maintain all environmental permits, approvals and registrations
	Characterise, monitor and control wastewater, solid waste and air emissions
	No use of prohibited or restricted or prohibited substances in component manufacture
	Lawful material disposal
	GHG emissions reduction targets, measurement and reporting
Ethical	Zero tolerance policy on all aspects of bribery, corruption, extortion and embezzlement etc
	Compliance with all anti-bribery and anti-corruption laws etc
	Due diligence to prevent and detect bribery and corruption in all business arrangements
	Prohibition on giving gifts or benefits to someone in government to obtain a commercial or personal advantage.
	Obligation to disclose conflicts of interest to Aristocrat



	Prohibition on fraud and deception etc
	Prohibition on using non-public information from Aristocrat for insider trading
	Transparent and accurate public disclosure of information
	Respect Aristocrat's intellectual property rights and preserves the confidentiality of Aristocrat Group information
	Comply with local fair business, advertising and competition laws, including fair trading and anti-trust laws.
	Comply with all conflict minerals laws
	Comply with laws and regulations concerning importing and exporting products and services
	Commit to data security and protecting privacy of personal information of everyone a supplier does business with
	Commit to developing and deploying AI systems ethically and responsibly
	Process for employees to raise concerns without fear of retaliation
Management systems	Systems and policies to manage compliance with laws related to supplier's operation, identify risks in supplier's operation, and ensure compliance with this code