

GLOBAL RISK MANAGEMENT POLICY

REFERENCE

1.3

EFFECTIVE DATE

September 2021

OWNER

ESC

1. POLICY STATEMENT

As we strive to ***'bring joy to life through the power of play'*** and hold to our commitment of being a "Good Business. Good Citizen", strong corporate governance must remain at our core. Effective corporate governance creates, protects and enhances shareholder value and ensures the future sustainability of our business.

Aristocrat recognises risk management as an integral part of good corporate governance, and a key input to strategic and operational planning, day-to-day management and decision making. Just as critical is a strong risk culture, where each of our employees consistently take the right risks in the right way. Taking the right risks, or those aligned with our company values and Board approved risk appetite, means greater certainty around our strategic outcomes.

At Aristocrat, our leaders believe:

- Taking risk creates opportunity,
- Effectively managing risk creates strategic advantage,
- Risk management does not impede progress, and instead creates value,
- Strong risk management reduces surprises, and ensures we are prepared to respond when needed, and that
- Clear risk principles underpin our values by empowering our people ("Talent Unleashed"), to make decisions that are in the best interest of the business ("Collective Brilliance"), our customers ("All About the Player") and community ("Good Business. Good Citizen").

Aristocrat is committed to ensuring that all risks and opportunities that could affect the achievement of its objectives and/or the continued efficiency and effectiveness of its operations are identified, assessed and managed to an acceptable level. The Aristocrat Group ("the Group") will incorporate risk management into decision-making processes. Risk management must also be included as a consideration in business unit and operational planning as a delegated line management responsibility. All staff must implement risk management according to this Policy that aligns to appropriate risk management standards.

2. PURPOSE

This document sets out the Group's policy on risk management. The purpose of this Policy is to establish and communicate a sound and prudent risk management framework ("the framework") to support the identification, assessment, monitoring and reporting, control, and mitigation of risks. The Policy is also intended to ensure that material risks are appropriately managed across the organisation and that exposures are aligned with business objectives, and the Board approved risk appetite.

3. APPLICABILITY

This Policy applies to all businesses and activities of the Group operating globally (including all subsidiaries) and to all directors, employees or other persons or organisations who act for or represent Aristocrat (including contractors).

Where necessary, more detailed risk management policies and procedures may be developed to cover specific areas of the Group's operations, such as business resilience. Where this occurs, such policies and procedures should align with the broad directions described in this Policy.

4. INTENT FOR RISK MANAGEMENT

The desired risk culture at Aristocrat is one that maintains a healthy tension between Aristocrat's entrepreneurial activities for creating enterprise value and its activities for protecting enterprise value requiring a balanced approach to risk management. Additionally, Aristocrat strives to be a risk intelligent enterprise whereby our employees' understanding and attitudes toward risk lead them to consistently make appropriate risk-based decisions, that align with the organisation's Board approved risk appetite.

At Aristocrat we manage risk every time we make decisions and act. Risk management at Aristocrat will:

- be proactive,
- identify opportunities to create and protect value to our strategic advantage,
- ensure our decisions are risk aware and informed by our understanding of risk and the potential impact, positive and negative, on our purpose and objectives,
- manage uncertainties to our benefit,
- provide early warning so pre-emptive action can be taken, and
- facilitate learning from success and failure.

5. RESPONSIBILITY AND ACCOUNTABILITY

Risk is the responsibility of everyone at Aristocrat. Below are key actions for each level of the Group (also see Appendix 2 - Aristocrat Risk Management Framework: Group Wide Responsibility Matrix):

The Board

- Set the desired risk culture and tone on risk for the Group.
- Review and approve (at least annually) the risk appetite within which the Board expects the Group to operate, along with the Global Risk Management Policy and Risk and Opportunity Management Support Guide.
- Ensure the Group has an appropriate risk management framework and internal control systems which are in compliance with this Policy.
- Monitor the effectiveness and adequacy of the Group's risk management systems, including the processes for identifying areas of significant business risk and oversight of internal controls.
- Assist Management to identify principal financial and non-financial risks and opportunities (including strategic, operational and macro risks and opportunities, covering both current and emerging risks) and to oversee and monitor these risks.

- Review and challenge the Risk Appetite Metrics Report and ensure sufficient monitoring and oversight on any risk approaching limit and breaches to limits.
- Compare the material risk assessment and risk profile with Aristocrat's policies and risk appetite and ensure that identified material risks are reduced to or managed at levels determined to be acceptable by the Board.
- Review and challenge the Enterprise Risk Profile and monitor Management's progress towards mitigation of material risks.
- Ensure risk is appropriately considered during strategy development and the strategic planning process.
- Ensure risk is appropriately considered when pursuing key strategic and operational initiatives.
- Ensure Aristocrat maintains an appropriate Business Resilience Program that supports organisation wide response and recovery.

Chief Executive Officer and Managing Director (CEO)

- Set the tone, culture and objectives of risk management including reinforcing risk appetite and tolerances.
- Establish and implement a sound system of risk management for the Group including ensuring adequate resources are in place.
- Review organisational performance against established risk appetite metrics.
- Ensure processes are in place to enable complete, accurate and timely disclosure of incidents to key stakeholders.
- Ensure principal financial and non-financial risks at the enterprise level are identified and assessed and appropriately managed, mitigated and/or controlled, and escalated to the Board in a timely manner.
- Make risk aware decisions to deliver on Aristocrat's purpose and objectives in accordance with risk appetite.
- Establish an appropriate Business Resilience Program that supports business response and recovery in the event of disruption.

Executive Steering Committee (ESC)

- Ensure Aristocrat's commitment to risk management is upheld within their respective business unit or function and reinforce the CEO's tone and objectives for risk management.
- Promote the desired risk culture across the Group and within their individual business unit or function so we consistently take the right risks, or those aligned with our risk appetite, in the right way, following appropriate assessment.
- Set Aristocrat's risk appetite and tolerance for formal approval by the Board.
- Communicate Aristocrat's risk appetite and tolerances within their business unit or function.
- Monitor adherence to the Group's risk appetite and prescribed risk behaviours within their business unit or function.
- Support the implementation of Aristocrat's risk management framework by embedding the Framework within their business unit or function.
- Ensure all material Enterprise and business unit level risks are identified, monitored, managed and reported on regularly to Group Risk and Audit.

- Ensure Group Risk and Audit are engaged on all material business decisions requiring Board approval.
- Make risk and opportunity aware decisions in accordance with Aristocrat's risk appetite.
- Support the implementation of Aristocrat's Business Resilience Program by ensuring business resilience plans remain current and are regularly tested.

Risk Champions

- Assist the ESC and their business unit/function in fulfilling their risk management role, including the implementation of Aristocrat's risk management framework, and the monitoring of adherence to the Group's risk appetite through the collation of appropriate risk metrics.
- Conduct quarterly risk update meetings and ensure risk is an agenda item on team meetings. This includes ownership of updates to business unit/functional risk register.
- Understand and educate business unit/function on Aristocrat's risk management framework.
- Recognise changes in the internal and external context and challenge their colleagues to review and update their knowledge, understanding and priorities to manage risk.

All Employees

- Understand Aristocrat's risk management framework and their role in managing the risks of the organisation.
- Make risk aware decisions that align with our Board approved Risk Appetite Statements by proactively seeking to discover risks and opportunities and understand their potential impact, positive and negative, on Aristocrat's purpose and objectives.
- Identify, manage and escalate risks within business unit/function, including performing risk assessment on key business activities (e.g. mergers, acquisitions, new products or markets, entering new geographies, debt facility management decisions and major company projects/programs) with support from Group Risk and Audit.
- Engage with and support activities (such as risk assessments, audits, and investigations or simulations when requested) to support Aristocrat to make risk aware decisions.
- Understand their role in the activation of business resilience plans.

Group Risk and Audit

- Support the CEO to establish and implement a sound system for risk management.
- Maintain the enterprise risk management framework including policies, plans, risk appetite statements and enterprise risk reports.
- Promote a risk aware culture and support the business to implement the risk management framework.
- Build risk management capability through training and awareness.
- Support the business to identify, assess and mitigate material business risks and draw connections between materials business risks.
- Support the business to identify emerging risks.
- Report on material risks and risk appetite metrics to the Board and the ESC.
- Maintain and oversee the Business Resilience Program.

6. FRAMEWORK FOR MANAGING RISK

Aristocrat's Risk Management Framework (the Framework) is designed to support the timely identification, evaluation, reporting and treatment of material risks and opportunities, so that they remain within acceptable thresholds as set by the Board of Directors. It is also designed to highlight emerging risks that are expected to evolve over time, that could materially impact our business should they materialise in the future.

In addition, Aristocrat's Risk Management Framework and associated processes support the management of risk at both an enterprise and business unit/functional level. This ensures a 'top down', 'bottom up' approach to risk management and addresses both financial and non-financial risk (legal and regulatory, reputation, environmental, people, health, safety and wellbeing, operational, information security and product and technology).

Aristocrat's Risk Management Framework consists of this Policy, our Risk and Opportunity Management Support Guide, our Board approved Risk Appetite Statements and metrics, our enterprise and business unit risk registers and our Business Resilience Program. (Refer to Appendix 1 – Aristocrat Risk Management Framework Documents and Appendix 2 – Aristocrat Risk Management Framework: Group Wide Responsibility Matrix for further details supporting these documents).

Importantly, the Framework aligns with the International Risk Management Standard ISO 31000, and is independently reviewed, at minimum, once every five years to ensure it remains contemporary and appropriate for Aristocrat and is operating effectively. The Framework encompasses the following steps:

Discover

- Identifying and analysing the main risks and opportunities facing Aristocrat.

Understand

- Evaluating those risks and opportunities and making judgements about whether they are acceptable or not and aligned with our risk appetite and corporate values. This will include identifying the things we are doing now to manage the risk or opportunity including existing controls.

Act

- Treating unacceptable risks by developing responses following the identification of unacceptable risks, including actions to eliminate or mitigate further, or response plans should the risk event materialise.
- Documenting these risks, controls and mitigating actions in risk registers and escalating material risks as appropriate.

Manage

- Performing ongoing monitoring, communication and review of material risks and opportunities.
- Implementing additional controls to manage these risks and opportunities in a way which is consistent with Aristocrat's Risk Appetite Statements.

Refer to Aristocrat's Risk and Opportunity Management Support Guide for further details on this process.

7. REFERENCE DOCUMENTS

The following documents can be accessed through Aristocrat's [PolicyHub](#):

[1.3.2 - Appendix - 2025 Connect and Unleash Aristocrat Risk Appetite Statements](#)

[Risk and Opportunity Management Support Guide](#)

[Business Resilience Policy](#)

APPENDIX 1 – ARISTOCRAT RISK MANAGEMENT FRAMEWORK DOCUMENTS

The table below outlines the hierarchy of the Risk Management Framework documents within Aristocrat, in addition to the document purpose, owner and frequency of review and/or update.

Document Title	Purpose	Owner	Frequency of Review and/or Update
Global Risk Management Policy	Sets out Aristocrat's policy on risk management. This includes the intent of risk management as well as the roles and responsibilities of all key stakeholder groups.	Group Risk and Audit	Annual
Risk and Opportunity Management Support Guide	Documents Aristocrat's process to make risk and opportunity aware decisions and take action. This includes our Risk Rating Methodology and escalation process for identified risks.	Group Risk and Audit	Annual
Risk Appetite Statements (RAS)	Defines and approves the level of risk and opportunity taking the company is willing to pursue to achieve its strategic and operational objectives whilst meeting its legal requirements.	The Board and ESC Maintained by Group Risk and Audit	Annual & Ad-hoc
Risk Appetite Metrics Reporting	Reports on metrics specific to each risk appetite statement to indicate whether we are operating within the desired risk tolerance range.	Group Risk and Audit	Biannually
Enterprise Risk Report (ERR)	Presents the residual risk profile for Aristocrat's top risks in the context of the Aristocrat Group strategy. Identifies key controls and mitigating actions and reports on movements in the residual risk profile from period to period.	ESC Maintained by Group Risk and Audit	Quarterly
Business Unit Risk Registers	Documents business unit risks to ensure they are appropriately managed, mitigated and/or controlled and gives visibility to the ESC and the Board of Business Unit Risk profile.	Business Units	Quarterly
Business Resilience Plans (BRP)	Documents the plan to respond, recover and resume operations during a serious adverse event. The BRP covers the key personnel, resources, services and actions required to effectively manage a crisis and ensure continuity of critical business processes and operations.	Business Resilience Teams	Annual

APPENDIX 2 – ARISTOCRAT RISK MANAGEMENT FRAMEWORK: GROUP WIDE RESPONSIBILITY MATRIX

The following table identifies the Group wide responsibilities for maintenance and adherence to the Aristocrat Risk Management Framework.

	Global Risk Management Policy	Risk and Opportunity Management Support Guide	Risk Appetite Statements	Risk Appetite Metrics	Enterprise Risk Report (ERR)	Business Unit Risk Registers	Business Resilience Plans
Board	Review and approve annually		Endorse and approve annually	Review biannually	Review quarterly		
ESC	Drive adoption		Refresh business unit / function of Risk Appetite Statements and drive adoption annually	Review quarterly	Review and update of enterprise-wide risks quarterly	Review overview of Business Units risks a quarterly	Drive engagement of Business Resilience Teams to ensure currency and annual review and testing of plans
Risk Champions	Educate business on policy, risk management process and application of Risk Appetite Statements			Provide metric updates quarterly		Business Unit Risk Register update quarterly	
Business	Understand and adhere to the requirements of the Global Risk Management Policy and Risk and Opportunity Management Support Guide		Refer and adhere to RAS as part of ongoing decision-making process	Provide data to Risk Champions to support risk metric reporting quarterly		Ongoing duty to identify, escalate and manage risks	Business Resilience Teams review, update and test Business Resilience Plans annually
Group Risk and Audit	Review and update annually		Review and update annually	Prepare report against provided metrics biannually	Refresh ERR quarterly using updates from the quarterly Business Unit Risk reviews and engagement with ESC	Support quarterly Business Unit Risk reviews	Maintain Business Resilience Framework including policies Maintain Crisis Communications Platform Support Business Resilience Teams