

# Aristocrat Code of Conduct

October 2023



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# Message from our CEO

Aristocrat has grown from humble beginnings to become a global entertainment and content powerhouse, powered by technology, and consistently pushing boundaries to generate world-leading gaming and mobile content. Since formation in 1953, our business has significantly expanded to more than 7500 employees worldwide, yet at our core Aristocrat remains guided by our strong values and standards.

At Aristocrat, we understand it is not just what we do, but how we do it. We pride ourselves on our 'People First' mindset which filters through 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. 'Good Business, Good Citizen' and 'Collective Brilliance' go to the heart of what we stand for as a company. These core values guide everything we do, from promoting responsible gameplay and good governance, to diversity and inclusion.

It is these priorities, among many others, which assist Aristocrat in setting new standards to strive for, as we continue our journey of constant improvement.

Our Code of Conduct is more than just a 'read and forget' policy document, it outlines these values and the standards of behaviour expected by all Aristocrat employees, senior executives and directors across the globe. It sets out expectations on how we conduct ourselves, how we hold ourselves and others to account, and ensures our people are best supported to deliver for themselves, the business, our players, suppliers, and community.

We have other People and Company policies that complement this Code, which can all 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

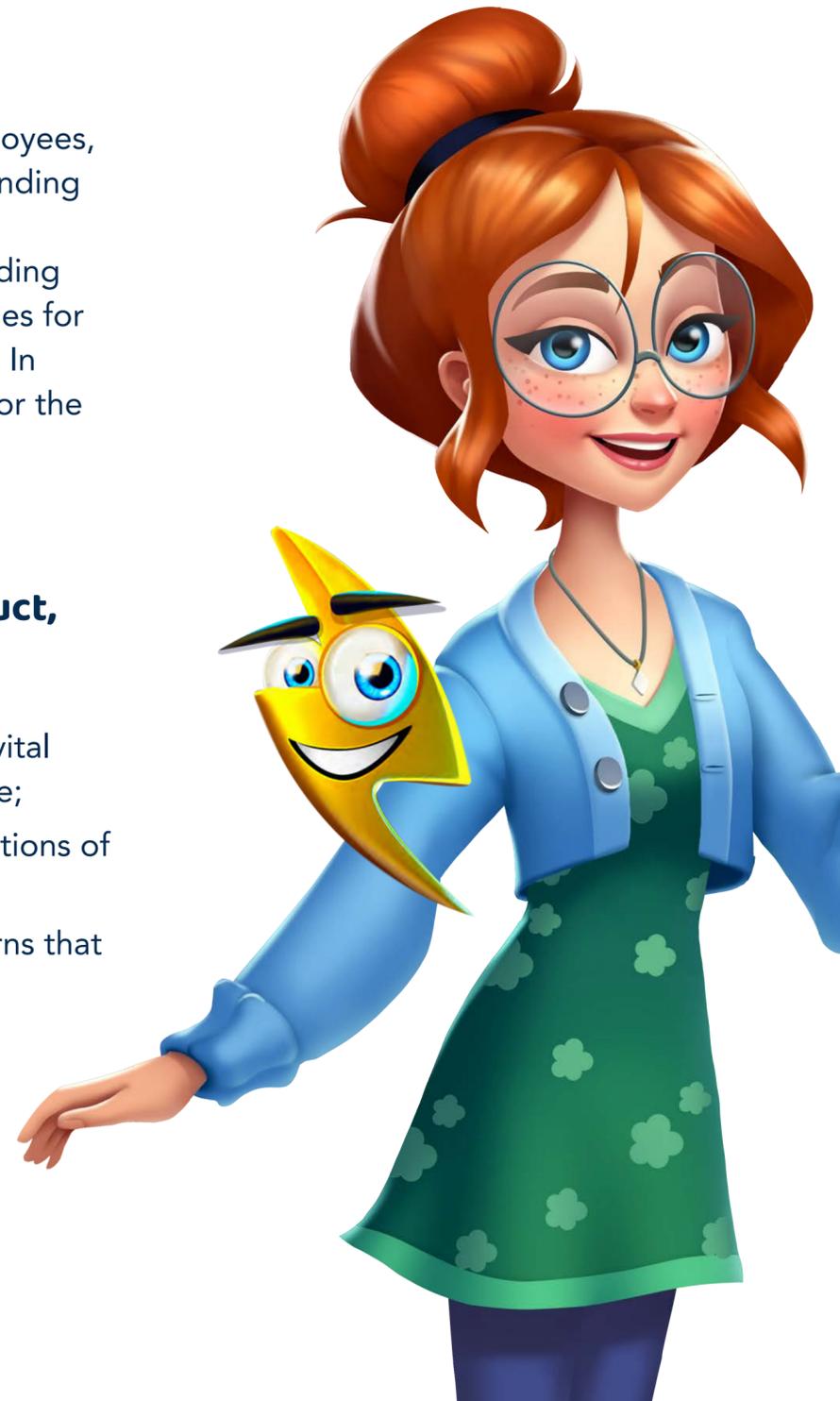
Each of us has a personal responsibility to follow the Code and ask questions if something doesn't feel right, or doesn't reflect our values.



This Code of Conduct (Code) is designed to ensure that Aristocrat employees, senior executives and non-executive directors have a common understanding of our company mission, values, the key commitments we've made and standards and rules we must adhere to as we do our jobs. By understanding and upholding these requirements, we're contributing to better outcomes for all employees, 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 all employees 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 as Aristocrat employees; and
- Encourage employees to take action and speak up if they have concerns that this Code is not being upheld.



## Compliance with the Code of Conduct is mandatory for all employees.

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

A breach of the Code, particularly where the conduct is unlawful, may result in personal consequences ranging from coaching and further training through to termination of employment.

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 employees, senior executives and non-executive directors work, support each other and our customers, and how we approach problems and make decisions.

### **We expect that each of us will:**

- Act in accordance with our values and in our best interests at all times;
- Act honestly and with high standards of personal integrity;
- Comply with all laws and regulations that apply to our operations globally;
- Act ethically and responsibly;
- Treat our colleagues with respect and not engage in bullying, harassment or discrimination;
- Deal with customers and suppliers fairly;
- Disclose and deal appropriately with any conflicts between your personal interests and your duties; and
- Not take advantage of your position, or of Aristocrat or its customers property or information, for personal gain or to cause detriment to anyone

\*This Code will be reviewed every two years to ensure compliance with ASX Corporate Governance Principals.



# Foundations of the Code

Anchored in our values & commitments

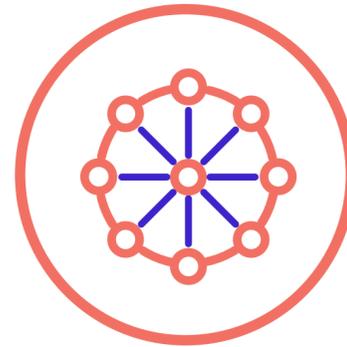


Our values distil the essence of Aristocrat. They outline our commitments, define our personality and capture what we expect from everyone who works and partners with us. Our values should continue to inspire and challenge us every day. As a high-achieving, dynamic and creative organisation, we are continually searching for new ways to bring them to life.



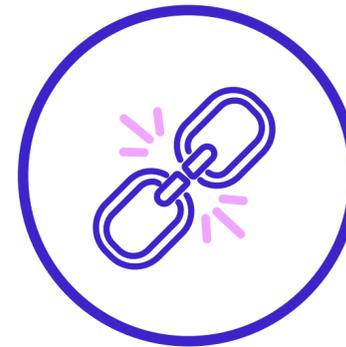
## All About the Player

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



## 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.



## Talent Unleashed

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



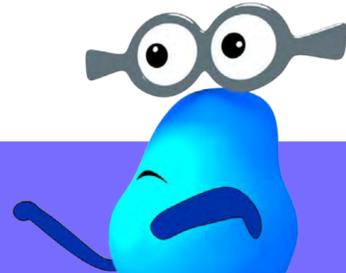
## Good Business Good Citizen

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

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

**Complying with this Code includes compliance with our Responsible Gameplay policy framework, which covers areas such as product design, marketing and loot boxes, as set out in the Aristocrat Group Responsible Gameplay Policy.**

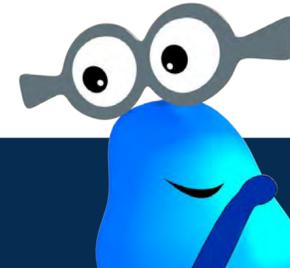
## Comply



This means compliance with relevant rules, regulation and legislation. This also means compliance with all applicable internal policies on responsible gameplay. Whether that's about data protection, privacy and platform rules for our social and digital games, or technical standards, licensing and game regulations in our real money gaming games, Aristocrat works hard to comply with the laws applicable to our business.

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 responsible gameplay policy.

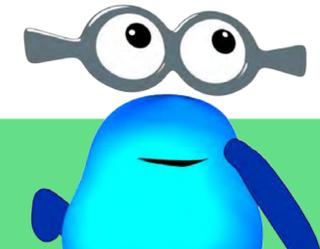
## Empower



Across our portfolio, we're doing more to educate and empower, because we believe player choice and empowerment is fundamental to satisfied customers and a vibrant business and industry.

This includes delivering more training for our employees, providing players with clear information on the way our games work, investing in developing and trialling responsible gameplay features with the support of our customers and providing options that give more choice and information to players of our games offered by Pixel United and Anaxi.

## Improve



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

We advocate and adopt best practice standards in our own business, we invest in responsible gameplay product innovation and we contribute financially to research done by academic institutions in the US and Australia to enhance the evidence base and promote better understanding.

In Aristocrat Gaming and Anaxi, we're also active in partnering with our customers to deliver and improve their own venue-based responsible gaming initiatives.

# Diversity & Inclusion



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 business performance. We commit to creating a culture of inclusion, where we collaborate, everyone is treated with respect, and everyone experiences a genuine sense of belonging.

## We can all support diversity and inclusion at Aristocrat by:

### Team Members

Value and respect the differences in others and speak up about behaviour that isn't consistent with 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.

### 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

Aims to attract and maintain a Board of Directors which has an appropriate mix of skills, experience and diversity; is responsible for governance, review and assessment of measurable diversity and inclusion objectives, and the verification of progress towards the attainment of the objectives and the success of the overall strategy.



**We believe there's strength in diversity.  
We want everyone to feel at home and  
do their best work here.**



## Our Commitment

At Aristocrat, we believe it is vital that working conditions across all our operations and supply chains are safe, and that all workers are treated with respect and dignity. As a global business committed to ethical and responsible practices, we recognise that we have a significant role to play in combatting Modern Slavery, which sadly still impacts an estimated 50 million people worldwide.

Aristocrat acknowledges that modern slavery and human trafficking are complex global problems that present risks to all businesses – including our own. We embrace our obligations to identify and address these issues across our business, and to achieve ongoing improvement.

We will continue to deepen our focus on education, communication, and collaboration as we progress our goals for the year ahead and continue our improvement journey in line with our people-focused, risk-based approach.

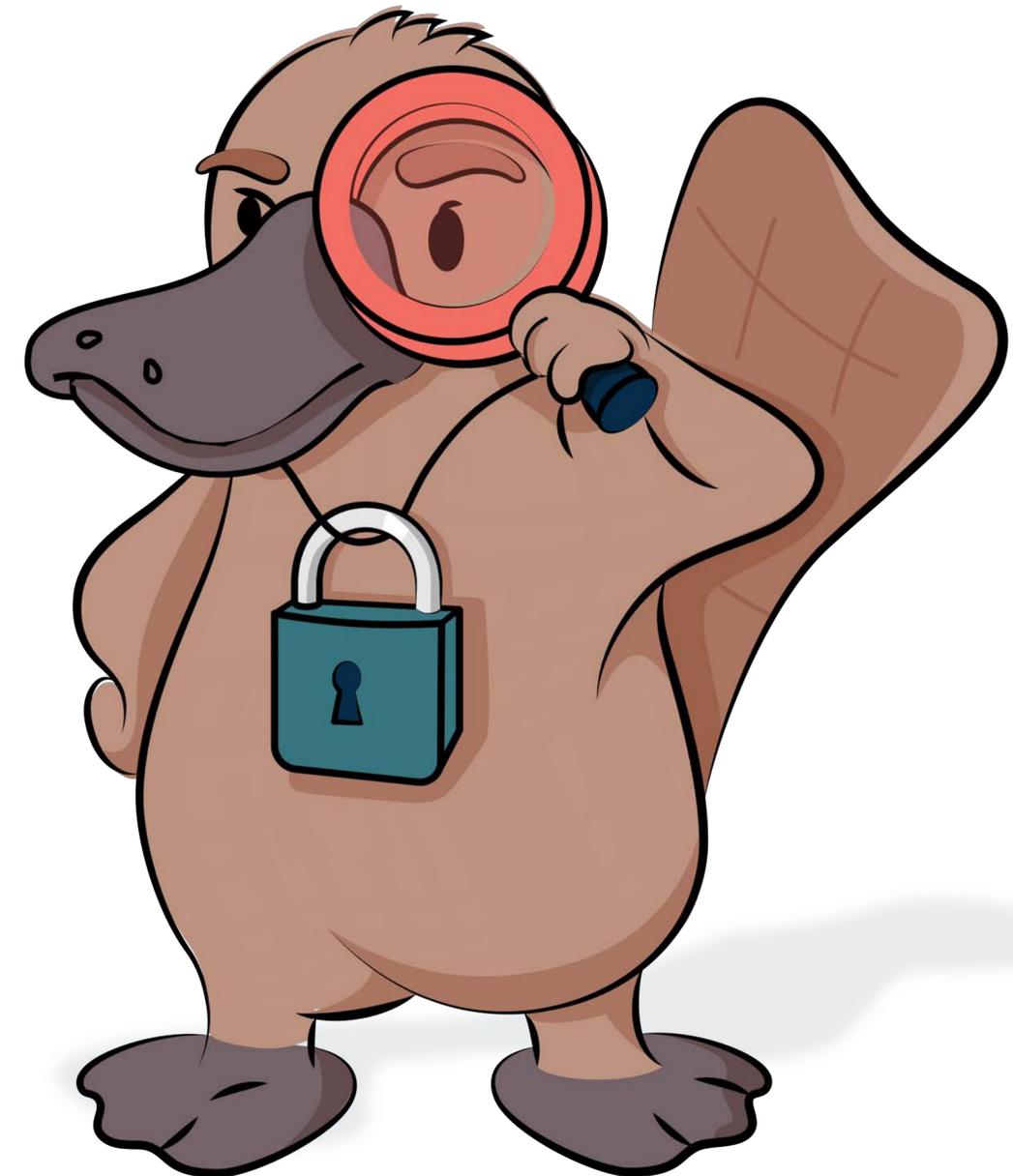
**At Aristocrat 'Good Business, Good Citizen' is a core value that guides our global business in everything we do.**

Privacy is a key component of good corporate citizenship.

When our players, customers, employees and other stakeholders entrust us with their personal information - which is any information that directly or indirectly identifies an individual – we take those obligations seriously.

Aristocrat has adopted Global Privacy Principles that are consistent with our company values and help us to comply with applicable laws and regulations. These principles explain our collection, use, storage and processing of personal data. Following these tenets allows us to create an environment designed to process personal data in a fair, lawful and responsible manner.

Want to know more about how Aristocrat ensures compliance with privacy laws?  
You can find a direct link to our Data Privacy SharePoint page (including our Global Privacy Principles) at the back of the Code.





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

To achieve this, we are passionate about continually enhancing the skills, knowledge, and commitment of our workforce, while engaging on HSE matters with all workers, suppliers and customers.

Aristocrat has designed 9 Core HSE Behaviours in the hope that by adopting each of them we will prevent serious incidents to our employees or negative environmental impacts at our 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.

**We will ensure a safe working environment where our workforce is empowered to speak up, take action and be responsible for their own health and safety and that of others.**

## 9 Core HSE Behaviours





# | 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.

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 undesirable conduct, and to encourage and protect those who report their concerns.

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.

If you come across a potentially serious matter, we encourage you to report your concerns to an Eligible Recipient or via the Ethicspoint portal. The 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.



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

You can find the link to the portal at the back of this Code.

# Group Policies

Aristocrat's policies communicate the company's values and expectations of employee behaviours and performance during both work and play.

Our key policies have been grouped into **five categories** to help you understand, locate and access the ones that are most relevant to you.



## Our Governance



We consider these to be 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, Third Party Entertainment & Gifts Policy
- Conflicts of Interest
- Diversity & Inclusion
- Global Information Security Acceptable Use Policy
- Global Whistleblower Policy
- Health, Safety & Environment Policy
- Media & Market Engagement
- Risk Management Policy & Appendices
- Share Trading Policy

## Legal



Our legal policies help ensure that employees are aware of their rights and responsibilities and that they are operating within the relevant laws and regulations. These policies also express our company's culture and values and play a crucial role in ensuring that employees feel supported and valued in their work.

### Key Legal Policies:

- Anti-Money Laundering Policy
- Continuous Disclosure Policy
- Contract Management Policy
- Dealing with Government Officials & Political Parties
- Document Retention Policy
- Global Privacy Policy
- Nevada Gaming Control Board Compliance Plan
- Regulatory Compliance Program
- Retention and Engagement of Outside Legal Counsel
- Suitability of Key Associates

## 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. With our shared values, we're committed to becoming a better business, every day. These policies ensure our business is not only bigger but also gets better every day.

### Key Business Policies:

- Anti Modern Slavery & Human Trafficking Policy
- Corporate Credit Card Policy
- Donations, Sponsorships & Charitable Contributions
- Emergency Mass Notification Policy
- Fraud Controls Responsibility Policy
- Global Financial Authorisation Limits & Contract Signing Policy
- Global Travel, Entertainment & Expense Policy
- Group Accounting Policies
- Group Intercompany Accounts
- Group Treasury Policy
- Mergers and Acquisitions Policy

## Our Products



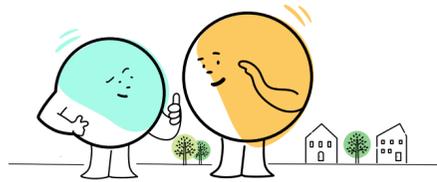
Understanding our product policies is important, because aligning with them, not only ensures that our products continue to be the best in the industry, but also ensures that our employees are proud of the work that they do everyday. By adhering to these policies, Aristocrat is demonstrating its commitment to excellence for our customers.

Our product policies put our commitment to product leadership into practice. All employees can help ensure our products deliver nothing but great performance and enjoyment for customers and players. Responsible Gameplay is truly part of our DNA.

### Key Product Policies:

- Aristocrat Group Responsible Gameplay Policy
- D&D IP Distribution Policy
- D&D IP Management Policy

## 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.

### Key People Policies:

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



Individually we are great,  
but **together** we are brilliant!

# For more information...

- > Visit the Data Privacy SharePoint Page **here**
- > View our 9 HSE Core Behaviours **here**
- > Visit the Ethicspoint portal & get information on how to report your concern **here**
- > View our Global Policies via the Policy Hub **here**



