



GLOBAL EMPLOYEE HANDBOOK AND
CODE OF CONDUCT

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WELCOME TO ARISTOCRAT

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

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

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

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

OUR MISSION

**BRINGING
JOY TO LIFE
THROUGH
THE POWER
OF PLAY.**

OUR VALUES

ALL ABOUT THE PLAYER

We bring joy to life through the power of play.

But ensuring we make the best games possible takes every part of our business – from our culture and capabilities, to our systems and processes.

We're focused, curious, analytical and innovative. We strive to gather better insights through customer engagement and, where appropriate, player feedback - and we always use data ethically.

By focussing on both customers and players we're able to deliver more choice, and better value.



TALENT UNLEASHED

Innovation, creativity and capability is the heart and soul of everything we do, and we're committed to nurturing the talents of all our people - no matter what they are, or what role they play in our diverse team.

We find and hire the finest talent from around the world, give them the tools they need to do their best work, and empower them to speak up, make decisions and take risks in the knowledge that they'll always have our trust and support.

From the top down, ours is an inclusive, innovative culture that gives everyone the opportunity to step up, challenge the status quo and contribute to our shared success.



COLLECTIVE BRILLIANCE

Individually we're great, but together we can be brilliant.

We champion the individual talents of our people, but we know that collaboration is what truly unlocks our full potential.

We celebrate our diversity and utilise our collective brilliance to manage capital, portfolios and projects in order to create more value for our customers, people and shareholders.

We know that when we work as one, we can achieve extraordinary things and push each other to do better every day.



GOOD BUSINESS, GOOD CITIZEN

We're a big company, with big responsibilities.

We know that gaming and digital games can be controversial, and that not everyone will like or trust us. But, we're proud of what we do, and of the products and play we bring to millions of people every day.

We take our responsibility to do the right thing for our customers, players, shareholders and each other, very seriously - because we know that being a responsible business and a good citizen is critical to our vision of a long-term, sustainable and vibrant games industry.

We're committed to strong, transparent practices, to listening more, and to improving the way we work in order to provide leadership and meet the legitimate expectations of our stakeholders.



OUR ENVIRONMENT

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

Aristocrat is also required to maintain a Compliance Plan outlining how it meets obligations in relation to the manufacture and supply of gaming equipment. You are required to familiarise yourself with the [Nevada Gaming Control Board Approved Compliance Plan](#) which is available on Policy Hub under “Our Legal”.

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

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

To further enhance this program, Aristocrat has developed a suite of compliance training courses and assessment tasks, some of which are assigned to all new employees. They must be completed by all new employees within 90 days of the commencing employment with Aristocrat.

When new training is introduced and assigned to an employee, it must be completed within the given timeframe.



YOU AND ARISTOCRAT

OUR RULES AND EXPECTATIONS

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

- Workplace violence, bullying and harassment
- Conduct during work hours
- Personal Relationships
- Working and acting safely
- Alcohol and drugs in the workplace
- Proper use of internet, email facilities and social media
- Disclosure of confidential information.



YOU AND ARISTOCRAT

A positive and dynamic work environment with a robust ethical culture is essential to collaborating effectively to better serve our customers. Employees must strive to support each other, and everyone is entitled to be treated with fairness and respect. We must value individual differences, unique perspectives, and beneficial contributions that each employee brings to our business. This section includes some important standards that we must follow in order to sustain an environment in which we can unite together.

TREATING EACH OTHER WITH RESPECT

Our ability to continue innovating and improving to offer superior products and services depends on talented people treating each other with respect. This can happen only when we interact with others in positive ways, promoting trust and a mutual desire to unite and collaborate.

COMMITMENT TO EQUAL OPPORTUNITY EMPLOYMENT

Every employee or job candidate will receive fair treatment and equal access to opportunities. We will not tolerate unlawful discrimination against any person.

We are firmly committed to equal employment opportunity to providing a workplace in which everyone has equal opportunity to success, free from unlawful discrimination, harassment or retaliation.

Aristocrat strictly prohibits discrimination on the basis of race, colour,

religion, sex, sexual preference or orientation, gender identity, marital status, veteran status, national origin, age physical or mental disability, or on the basis of any other category protected by applicable law.

This applies to all aspects of employment, including (but not limited to) hiring, compensation benefits, promotion, transfers, discipline and termination.

Any incidents of discrimination should be reported immediately to the HR department.

RULES ARE THERE TO PROTECT EVERYONE

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

This Code of Conduct is not designed to outline or encompass all policies and procedures. It is your responsibility to familiarise yourself with these policies and procedures. For full information on all other policies and procedures that relate to your employment with Aristocrat, visit [Policy Hub](#), speak with your manager or HR.

YOU AND ARISTOCRAT

FREEDOM FROM HARASSMENT AND OTHER OFFENSIVE BEHAVIOUR

Harassment and other offensive behaviour have no place at Aristocrat and will not be tolerated. We all have the right to work in an environment that is harassment-free and to expect that reports of inappropriate behaviour can be brought without fear of reprisal.

Aristocrat is committed to a work environment free from all forms of offensive behaviour, including harassment. Employees must refrain from any inappropriate, insulting, intimidating, violent, abusive, demeaning or bullying conduct towards others. In addition to covering all employees, this policy extends to outside vendors, clients, and other professionals providing services to Aristocrat.

“Harassment” includes unwanted verbal or physical conduct relating to race, colour, religion, sex, sexual preference or orientation, gender identity, marital status, veteran status, national origin, age physical or mental disability, or any other legally protected category.

Examples of harassment include but are in no way limited to:

- Persistent and unwelcome flirting, pressure for dates or sexual comments
- Unwelcome touching
- Sexually suggestive or racially offensive jokes, gestures, or sounds

- Making or threatening to make submission to sexual advances or requests for sexual favours a requirement for any job opportunity or benefit
- Degrading or disparaging comments about a persons race, sex, religion, age or national origin
- Displaying, sending or storing pornographic, obscene, or sexually suggestive picture or other materials; or
- Using or displaying ethnic, racial, national origin, religious, sexual or other slurs, or symbols associated with hate groups

EMPLOYEE PRIVACY

Aristocrat respects the privacy of our employees’ confidential personal information.

We are committed to protecting our employees’ confidential personal information as defined by applicable law. Unauthorised release of confidential personal information could harm the individuals concerned as well as Aristocrat. It could also violate applicable laws. Access to confidential personal records must be limited to Aristocrat personnel whose function and responsibilities specifically include the handling of such personal data, and who have a business need for that information.

If you inadvertently come across such information, you should contact Legal immediately.

YOU AND ARISTOCRAT

PERSONAL RELATIONSHIPS

In the workplace, close personal or sexual relationships between employees, or with other people with whom employees may deal with in the course of their work with Aristocrat, may occur (Personal Relationships).

Personal Relationships may create actual or potential conflicts of interest for the employees or other people involved, or perceptions about conflicts of this nature. Impropriety or favouritism can arise. This can raise serious issues regarding trust, confidence, integrity, equality, merit, and morale.

Aristocrat expects that high standards of professionalism, ethics, and equality will be maintained at its workplaces. As a result, if you have (at the time of employment) or you develop during your employment a Personal Relationship with an Aristocrat co-worker, contractor, or other person with whom you may deal with in the course of your work for Aristocrat (for example, a customer or supplier), you must disclose that relationship to your manager.

Aristocrat may, at its discretion, take appropriate steps to deal with the Personal Relationship including modifying reporting lines, duties, department, location, or team structure to ensure the working environment is not impacted by the Personal Relationship and that the integrity of Aristocrat's commercial relationships and reputation is maintained.

For Key Management Personnel and any Officer of an Aristocrat company, Aristocrat considers that any Personal Relationship between one of these persons and an Aristocrat employee, contractor, supplier or customer is a conflict of interest and must immediately be disclosed to the Aristocrat CEO and Board. Any disclosure of a Personal Relationship will, to the extent possible, be treated confidentially.



YOU AND ARISTOCRAT

SAFE AND HEALTHY WORKPLACE

Aristocrat will not compromise on the safety and health of its employees or of others working on our premises. We will take all reasonable precautions to provide workplaces that are safe and healthy.

We must always:

- Comply with all health and safety policies and procedures applicable at our work location;
- Report any accident, injury, illness, unsafe or unhealthy condition on our premises of which we become aware;
- Avoid risking impaired judgement or injury through alcohol or drugs, whether legal or illegal;
- Know what to do in an emergency.

SAFETY COMMITTEES

Aristocrat has active Health and Safety Committees, representing both employees and management, in each major work location / area.

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

SAFETY AND CONTRACTORS

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

COMMUNITY COMMITMENTS

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

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

SECURITY OF ARISTOCRAT ASSETS

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

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

YOU AND ARISTOCRAT

DRUGS AND ALCOHOL

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

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

SMOKING

All Aristocrat workplaces are smoke free zones, including showroom facilities. This includes e-cigarettes / vapour devices.

WEAPONS

Weapons or explosives may not be carried into any company facility company vehicle, company rented vehicle or while traveling on or engaged in any Aristocrat business.

SAFE USE OF TECHNOLOGY

Employees should not use any phone, or other handheld electronic device or any other object if it will distract you from driving or prevent you from acting in a safe and responsible manner.





YOU AND ARISTOCRAT

INTERNET AND EMAIL USAGE

While Aristocrat recognises the fundamental right to privacy of its users, it reserves the right to monitor the use of the email and Internet system to prevent and investigate actions that may be illegal, to protect the business interests of Aristocrat, to ensure the security and continued availability of its email and internet system, to respond to document collection and processing requirements in investigations and litigation and to ensure that this policy and other Aristocrat policies are respected. Such monitoring activities will take place in compliance with local laws and regulations.

Aristocrat discourages any use of the e-mail, the Internet and all other computing service that may leave a record of personal data that is private in nature or that the user would prefer not to be revealed in the course of an investigation. While the private use of these systems is allowed, such use should be restricted and should be expressly identified as private.

Aristocrat will conduct overt surveillance of all use of E-mail, the Internet and all other computing services to the extent allowed under local laws and regulations. In case of inappropriate or suspicious use of email, the Internet and other computing services, Aristocrat reserves the right to block and/or examine what it considers to be inappropriate content or IP material in any form that could compromise the commitments stated within this policy or another Aristocrat policy, or constitute a violation of the law. Best efforts will be made to only monitor those emails that are marked as Personal if there are clear indications of fraud or wrongdoing.

YOU AND ARISTOCRAT

SOCIAL MEDIA PARTICIPATION AT ARISTOCRAT

Whether you log into Facebook, Twitter, Linked in, Instagram, or any other social media platform, comment on online media stories, or participate in internal forums, such as discussion boards on Ally or Yammer — our social media guidelines apply.

While all Aristocrat employees are welcome to participate in social media, we expect everyone who participates to understand and to follow these simple but important guidelines:

- Do not comment on or disclose confidential information such as financial information or future business performance
- Respect our intellectual property and that owned by others
- All statements must be true and not misleading; all claims must be substantiated
- Never comment on anything related to legal matters, litigation, or any parties Aristocrat may be in litigation with
- Post meaningful, respectful comments — in other words, no remarks that are off-topic or offensive
- When disagreeing with others' opinions, keep it appropriate and polite
- Never participate in social media when the topic being discussed may be considered a crisis situation involving Aristocrat or its people

MEDIA AND MARKET ENGAGEMENT

Aristocrat's communication with external stakeholders including media, stock analysts and investors must be effective and accurate, while upholding Aristocrat's continuous disclosure and other legal obligations.

Approaches from the media may include requests for interview, invitations to participate in events, including industry panels and tradeshow events, requests for comment and statements on behalf of the company. Approaches from Analysts & Investors may include requests for information, comment and clarifications to previously issued statements, invitations to events and meeting requests.

Any enquiries from the external stakeholders must be managed in accordance with our [Media and Market Engagement Policy](#) which outlines the roles that are authorised to respond on behalf of the Company – it is important that employees comply with this policy at all times.

Interactions with external stakeholders must be based on the principals that only authorised people may provide comment and that comments should always be accurate and appropriate.

Any employee that has been approved to speak to external stakeholders will be provided advice on approved messaging and issues to avoid.

YOU AND ARISTOCRAT

WHISTLEBLOWERS/ ETHICSPPOINT

In view of Aristocrat's commitment to strong corporate governance, we encourage a culture where incidences of misconduct are identified and reported.

To assist in achieving this aim, Aristocrat provides a confidential telephone and website service that provides an effective channel for employees to anonymously report instances of suspected misconduct. This is an independent service provided by a third party. For legal reasons, the process for employees in the European Union is slightly different, and reports will be treated confidentially rather than anonymously (such that EU employees will be required to provide their name, on a confidential basis).

This service allows you to report incidents such as (but not limited to) the following:

- Theft
- Fraud
- Dishonestly
- Breaches of policy/procedure
- Discrimination
- Harassment/Bullying
- Workplace safety & environmental hazards
- Misconduct of other unethical behaviour
- Conflicts of Interest

If you are not comfortable reporting a matter through internal channels, simply dial one of the following numbers in your region – these are accessible globally 24 hours a day, 365 days a year.

Alternatively, you may also report incidents via the following link:

[Ethics Point Whistleblower Portal](#)

Region	Toll Free Number
Argentina*	0-800-288-5288 (ALA Spanish)
	0-800-555-4288 (Argentina Telecom)
	0-800-222-1288 (Telefonica)
Australia	1800-408-934
Canada	1-877-247-3532 (English)
	1-855-350-9393 (English, French)
India*	000-117
Israel*	180-931-7130
Macau*	0-800-111
Mexico*	001-877-388-9168
Malaysia	1-800-81-8917
New Zealand*	000-911
Philippines*	1010-5511-00 (PLDT -Tagalog Operator)
	105-11 (Globe, Philcom, Digitel, Smart)
	105-12 (Globe, Philcom, Digitel, Smart - Tagalog Operator)
Puerto Rico	1-877-247-3532
Russia	499-951-6133
South Africa	080-09-92604
Spain	900-99-0011
Singapore	800-110-2318
Ukraine*	Line activation due by June 2018
	0-800-502-886
United Kingdom*	0-500-89-0011 (C&W)
	0-800-89-0011 (British Telecom)
USA	1-877-247-3532
Other	1-877-247-3532



INTEGRITY AT WORK AND PLAY

CONFIDENTIAL INFORMATION

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

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

Providing any details of Aristocrat's confidential or sensitive information to parties outside Aristocrat without the necessary approval may result in legal action and/or disciplinary action (up to and including termination) being taken against you by Aristocrat.

If you leave Aristocrat, you are not permitted to take with you copies of computer programs, files or any other Company records.

INTEGRITY AT WORK AND PLAY

INSIDER TRADING

As a publicly listed company Aristocrat and its employees are subject to insider trading laws. “Inside information” is any information about Aristocrat which is not generally available to the market and, if it were available to the general public, would be likely to have a material effect on the price or value of Aristocrat securities.

It is an offence to:

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

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

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

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

If you believe you are a Designated Person, or believe you are in possession of inside information, you should contact Company Secretariat for advice before dealing in Aristocrat securities.

INTEGRITY AT WORK AND PLAY

RESPONSIBLE GAMING

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

In some jurisdictions, the playing of gaming machines or gambling in any form is illegal for Aristocrat employees. You must familiarise yourself with the legislation pertaining to the environment in which you work. Please refer to our [Playing our Products Policy](#) and our [Playing our Products Responsibly Policy](#) located on Policy Hub.

GAMBLING AT CROWN RESORTS PROPERTIES

All employees globally are prohibited from gambling on Aristocrat Electronic Gaming Machines (“EGM’s”) at any Crown Resorts property – for clarity, these properties are: -

- Crown Melbourne
- Crown Perth
- Crown Sydney
- Crown Aspinall's London



Any employee found by Crown to be playing an Aristocrat EGM may be removed from the premises and any winnings/credits withheld by Crown.

POLITICAL DONATIONS

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

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

MODERN SLAVERY & HUMAN TRAFFICKING

Aristocrat is committed to ethical sourcing and the prevention of worker exploitation — including modern slavery and human trafficking — in its own business and in its global supply chains. We have a zero-tolerance approach to modern slavery and human trafficking, and we will adhere to all laws relevant to countering modern slavery and human trafficking that apply to our business.

Our requirements are set out in further detail in our [Anti-Modern Slavery and Human Trafficking Policy](#), which includes guidance on how to identify and report potential modern slavery and human trafficking risks.

INTEGRITY AT WORK AND PLAY

CONFLICTS OF INTEREST & OUTSIDE EMPLOYMENT

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

You must promptly disclose this type of personal interest to Compliance. The conflict may be avoided by eliminating this particular interest or by changing your duties at Aristocrat.

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

- Involves Aristocrat's customers, suppliers, agents, distributors or any other business associate;
- Competes with Aristocrat services and customers;
- Interferes with your Aristocrat duties;
- Diminishes your ability to give your total effort to your Aristocrat duties;
- Uses the facilities and property of Aristocrat such as computers, phones, photocopiers, and faxes; or
- Creates an identification with, or perceived link to or support from Aristocrat.

If you are unsure about being involved in outside employment or business activities or conflicts of interest, you should review the [Conflicts of Interest Policy](#) and contact Compliance if you have further questions or need to make a disclosure.



INTEGRITY AT WORK AND PLAY

FINANCIAL APPROVAL MATRIX

The Financial Approval Matrix is in place to ensure all decisions that financially obligate the Company have the appropriate level of approval within pre-established and documented authority limits.

The Financial Approval Matrix details authority limits under different expenditure categories (e.g. Operational Commitments, Travel and Expenses etc.). Authorised signatories can approve expenditure based on their authority limit as detailed in the Financial Approval Matrix which is published on the intranet accessible here: [Financial Approval Matrix](#)

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

Note: The Financial Approval Matrix does not provide legal contract signing authorities; please refer to the legal contract signing matrix for all contract approvals.

EXPENSES

Aristocrat will reimburse its employees for legitimate business expenses that are supported by original documentation including tax invoices.

Aristocrat will not however, reimburse employees for any expenditure that

falls outside the terms of the [Business, Travel & Entertainment Policy](#).

You must familiarize yourself with this policy prior to committing the company to expenditure.

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



INTEGRITY AT WORK AND PLAY

BRIBERY AND CORRUPTION

Aristocrat strictly prohibits acts of Bribery and Corruption.

Bribery means offering, giving or receiving, or agreeing to give or receive, an undue reward or benefit, whether financial or non-financial, to induce the recipient to misuse his or her power in a manner that helps Aristocrat obtain an unfair advantage. Acts of bribery are designed to influence individuals to act dishonestly while performing their job or violate a duty of loyalty to their employer.

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

A bribe can take the form of anything of value and may include:

- Cash or cash equivalents (e.g., loans, traveller's checks, cashier's checks, gift cards, vouchers, debit cards);
- Meals, gifts, travel, and entertainment;
- Charitable contributions and political contributions;
- Sales and marketing incentives such as prizes; and
- Favours, such as helping someone secure a job or internship or obtain admission to a school.

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

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

CONSEQUENCES OF BRIBERY AND CORRUPTION

The consequences of bribery and corruption can include severe fines and penalties for Aristocrat for actions taken by Aristocrat employees and third parties engaged by Aristocrat.

Individual liability includes fines and prison sentences and ongoing operational and reputational costs.

GOVERNMENT EMPLOYEES

Transactions with government employees create particular risk under bribery and corruption laws, so Aristocrat imposes strict limits on what things of value may be provided to government employees.

Some countries may have laws that are even stricter than Aristocrat's policies. If that is the case, then the stricter rule applies.

INTEGRITY AT WORK AND PLAY

BUSINESS GIFTS & HOSPITALITY FOR GOVERNMENT EMPLOYEES

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

- It is not offered to gain an improper advantage or influence official action;
- It is permitted by local law and by the internal rules of the recipient's employer;
- The value complies with the matrix in this section;
- The frequency of prior gifts or hospitality provided to the same recipient would not raise an appearance of impropriety;
- It is recorded fairly and accurately in Aristocrat records; and
- If the recipient has direct or indirect decision-making responsibility over an anticipated or pending decision that will affect Aristocrat's interests, then special caution must be exercised.
- Approval has been received from Compliance where required.

BUSINESS GIFTS AND HOSPITALITY FOR NON-GOVERNMENT EMPLOYEES

Providing gifts and hospitality (e.g., meals, travel, entertainment) is often considered a form of courtesy and is common in everyday business in many countries. As we operate in a highly regulated industry there are limitations on the dollar value of gifts and entertainment that must be adhered to.

Refer to the matrix in this section for additional information

FACILITATION PAYMENTS

Facilitation payments are payments to Government Employees to secure or expedite a routine government action, such as issuing licenses or permits. Facilitation payments are considered bribes under various laws and are strictly prohibited by Aristocrat.

Payments to government agencies or institutions for legally-required administrative fees or paying for legally-recognized fast-track services are not considered to be facilitation payments.

INTEGRITY AT WORK AND PLAY

BUSINESS GIFTS & HOSPITALITY EXPENDITURE MATRIX

	Offer to a Government Employee	Offer to a Tribal Regulator	Offer to another Commercial Counterparty	Acceptance by an Aristocrat Employee
Meals and Entertainment				
Offering or accepting meals and/or entertainment (total value)	Compliance approval	Up to USD \$50p.p. (incl tip and taxes)	Up to USD \$400 p.p. (incl tip and taxes)	Up to USD \$150
Gifts				
Offering or accepting gifts	Compliance approval	Up to USD \$50	Up to USD \$150	Up to USD \$150
Travel				
Offering or accepting travel	Compliance approval	Compliance approval	Compliance approval	Compliance Approval



- Any requests to exceed the thresholds set in the above matrix must be referred to Compliance for review and approval before proceeding.
- Where the Chairman or the Chief of the Tribal Gaming Commission (Tribal Regulator) is also the CEO of the Casino (Customer), the Tribal Regulator threshold should apply. As with all thresholds, if we wish to exceed this limit, contact Compliance for guidance/approval before proceeding.
- Where we take customers to events such as concerts and sporting events, the face value or fair market value of a ticket + estimated meal costs should be applied including where the event is at our corporate box. If we wish to take customers to events (including food and beverage) that would exceed the above limits, contact Compliance for guidance/approval before proceeding.
- As travel presents more significant corruption risk than meals and entertainment, it should be evaluated carefully. That's not to say travel cannot be provided, but we need to have a thorough, documented review process so that compliance mitigation measures are in place to help lower the risk.
- Offering of meals, entertainment or gifts in line with this matrix must also comply with the recipients' policies – always check before making the offer.
- Commercial counterparties may include customers, suppliers, etc.

INTEGRITY AT WORK AND PLAY

EXPORT DECLARATION

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

Our approach to disclosures on export documentation must be to meet the aims of the customs authority in the region receiving the goods. Under no circumstances will Aristocrat be a party to arrangements such as low-value invoicing nor will we assist any customers to avoid their customs obligations.

SECURITY IDENTIFICATION

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

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

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

COPYRIGHT

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

TRADE PRACTICES

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

In particular, Aristocrat will not:

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

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



A SUMMARY OF OUR EXPECTATIONS

Our expectation is that all Directors, Executives & Employees will:

- act in accordance with our values and in the best interests of Aristocrat
- act honestly and with high standards of personal integrity
- comply with all laws and regulations that apply to Aristocrat
- 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 their personal interests and their duties at Aristocrat
- not take advantage of the property or information of Aristocrat or its customers for personal gain or to cause detriment to Aristocrat or its customers
- not take advantage of their position or the opportunities arising for personal gain, and
- report breaches of the Employee Handbook & Code of Conduct to Compliance.

This Employee Handbook & Code of Conduct will periodically be reviewed to check that it is operating effectively and whether any changes are required.

A FINAL WORD...



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

You are now required to confirm that you have read this Employee Handbook & Code of Conduct in full and acknowledge that you have understood the requirements laid out, that you will comply with all aspects of the Handbook and our Global Policies & Procedures and that you will report any breaches to Compliance for follow up.

Please access the assessment page to complete your acknowledgement.

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