

Modern Slavery Statement 2022

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This is an interactive PDF designed to enhance your experience. The best way to view this Statement is with Adobe Reader. Click on the links in the table of contents or throughout the document to navigate the Statement.

Reporting Entities

Aristocrat Australian Reporting Entities:
1. Aristocrat Leisure Limited (ACN 002 818 368)
2. Aristocrat International Pty Ltd (ACN 000 148 158)
3. Aristocrat Technologies Australia Pty Limited (ACN 001 660 715)
4. System 7000 Pty Ltd (ACN 605 116 783)

Legislation: *Modern Slavery Act 2018 (Cth)*
(Australian Modern Slavery Act)
Reporting Year: 3
Reporting Period: 1 October 2021 – 30 September 2022 **(Financial Year 2022)**
Type of statement: joint statement

This Modern Slavery Statement is submitted in accordance with section 14 of the Australian Modern Slavery Act by Aristocrat Leisure Limited to cover each of the Aristocrat Australian Reporting Entities specified above and covers all seven mandatory criteria for reporting as set out in section 16 of the Australian Modern Slavery Act.

Aristocrat UK Reporting Entities:
1. Product Madness (UK) Limited

Legislation: *Modern Slavery Act 2015 (UK)*
(UK Modern Slavery Act)
Reporting Year: 2
Reporting Period: 1 October 2021 – 30 September 2022
Type of statement: mandatory statement

For the purposes of the UK Modern Slavery Act, this Modern Slavery Statement is provided by Product Madness (UK) Limited.

2. Aristocrat Technologies Europe Limited

Legislation: UK Modern Slavery Act
Reporting Year: 6
Reporting Period: 1 October 2021 – 30 September 2022
Type of statement: voluntary statement

For the purposes of the UK Modern Slavery Act, this Modern Slavery Statement is provided voluntarily by Aristocrat Technologies Europe Limited (**ATEL**). For Financial Year 2022, ATEL did not meet the threshold for reporting and submitting a statement as required under section 54 of that Act. However, ATEL is providing this Modern Slavery Statement on a voluntary basis to document ATEL's year-on-year progress.





Neil Chatfield
Chairman

Foreword from The Chairman and CEO

At Aristocrat 'Good Business, Good Citizen' is a core value that guides our global business in everything we do. This includes our anti-modern slavery program, which reflects our values and company mission of 'bringing joy to life through the power of play'.

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.

This is the third annual Modern Slavery Statement (**Statement**) published by Aristocrat under the Australian Modern Slavery Act. Since 2017, we have also reported as required under the UK Modern Slavery Act, building a formalised, coordinated, and enterprise-wide approach to this crucial issue.

We were proud to receive an 'A' rating for our 2021 Modern Slavery Statement from Monash University,[1] placing Aristocrat within the top 25% of ASX100 companies. Aristocrat was also recognised as one of the companies which demonstrated the biggest improvements in the quality of their modern slavery statements from 2020 to 2021, and we remain focused on exploring new ways to further enhance our anti-modern slavery program.

In 2022, we held our inaugural Anti-Modern Slavery and Environmental, Social and Governance (**ESG**) Summit attended by senior leaders from across our global business. The Summit provided an opportunity to raise awareness around modern slavery risks, highlight the action we can take to address these risks, and lay the foundation for ongoing staff engagement. The Summit also demonstrated our cross-functional, multi-disciplinary approach to addressing modern slavery risks.

As a business, we are pleased to report that Aristocrat achieved the key goals we set for this reporting period, while also implementing additional measures. Key developments captured in this Statement and delivered across the reporting period include:

- The Pixel United business making significant strides in implementing several enterprise-wide initiatives, including rolling out tailored modern slavery prevention training and an anti-modern slavery and human trafficking policy. This follows the rollout of a training program for the Aristocrat Gaming business in the previous year.
- Integrating modern slavery questions into due diligence processes for proposed mergers & acquisitions (**M&A**).

[1]Pham, N., Cui, B., & Ruthbah, U. (2022) Modern Slavery Disclosure Quality Ratings: ASX100 Companies Update 2022 [Research brief]. Monash Centre for Financial Studies, Monash Business School. DOI: 10.26180/20224614.



Trevor Croker
Chief Executive Officer
& Managing Director

- Expanding contractual protections to include specific modern slavery clauses in our key staffing agreements for contingent workers.
- Expanding our risk assessments to include indirect sourcing arrangements and assessing additional areas in our internal operations in a prioritised manner.
- Establishing a network of Anti-Modern Slavery Champions across Aristocrat's global business.
- Delivering presentations to key suppliers on Aristocrat's expectations around modern slavery risk mitigation and directly validating compliance with our Supplier Code of Conduct.

This reporting period also presented new and ongoing challenges for our business, with the conflict in Ukraine and the ongoing effects of the COVID-19 pandemic. We remain committed to our robust anti-modern slavery program, to ensure that our business operations are sustainable and conducted ethically in line with applicable laws, and that all workers in our operations and supply chains are treated with respect and dignity.

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

In this Statement, we use the term 'anti-modern slavery' where possible, as we recognise the special sensitivity of the term slavery, and the ongoing impact of historical slavery, for some people and communities at Aristocrat. We acknowledge and respect these sensitivities without reservation. In no way do we seek to draw comparisons between people's experiences or minimise history in this regard, but rather to play our part to ensure slavery can never be part of our business today.

We acknowledge and thank our dedicated Anti-Modern Slavery Working Group, and all our people who have contributed, for their energy and leadership on these vital issues.

This Modern Slavery Statement has been approved by the relevant Boards in accordance with the requirements of the Australian Modern Slavery Act and the UK Modern Slavery Act.

Neil Chatfield
Chairman

Trevor Croker
Chief Executive Officer
& Managing Director

I. Who we are: Our structure and business



Aristocrat Leisure Limited (**ALL**) is an entertainment and content creation company powered by technology to deliver world-leading mobile-first and casino games, entertaining millions of players across the globe every day. The company has three operating units: Aristocrat Gaming, Pixel United (encompassing the Product Madness, Plarium and Big Fish Games business units) and Anaxi (online RMG), supported by more than 7,000 employees in over 20 locations around the world, and united by the common mission of **"bringing joy to life through the power of play".**

A. OUR STRUCTURE

ALL

ALL is the parent company for the Aristocrat Group. It is incorporated in New South Wales and is listed on the ASX (ASX: ALL). Each Aristocrat Australian Reporting Entity (other than ALL):

- is incorporated as a proprietary limited company in Australia; and
- is either a direct or indirect subsidiary of ALL.

Several of Aristocrat's Australian Reporting Entities own or control a number of subsidiaries or branches which also form part of the Group.

ATEL

Aristocrat Technologies Europe Limited (**ATEL**) is incorporated as a limited liability company in the United Kingdom and is an indirect subsidiary of ALL. ATEL has one direct subsidiary, Aristocrat Technologies Spain S.L., which is incorporated in Spain. ATEL is also registered and operating as a branch in Cyprus under its own name.

PML

Product Madness (UK) Limited (**PML**) is incorporated as a limited liability company in the United Kingdom. PML has four direct subsidiaries: Product Madness Ukraine LLC (incorporated in Ukraine), Product Madness France SAS (incorporated in France), Product Madness Israel Limited (incorporated in Israel) and Product Madness España S.L. (incorporated in Spain). PML also has one indirect subsidiary, Product Madness sp. z o.o., incorporated in Poland. PML is a direct subsidiary of Aristocrat Technologies Europe (Holdings) Limited, which is incorporated in the United Kingdom and is an indirect subsidiary of ALL.

In this Modern Slavery Statement, we refer collectively to ALL and its global subsidiaries, including the Aristocrat Australian Reporting Entities, ATEL and PML as **the Group, Aristocrat** (where applicable), **us**, **our** or **we**.

Not all entities in the Group have reporting obligations. However, because we take an enterprise-wide approach to what we do, all entities in the Group comply with relevant policies and procedures in this space (with limited exceptions, as noted in this Statement).

B. OUR BUSINESS

The Group has offices and employees located around the world. ALL has its corporate headquarters in North Ryde, Sydney, Australia.
Globally, the Group offers a diverse range of products and services including electronic gaming machines (**EGM**s), casino management systems and mobile-first games.

Location of Group Employees

7500+
Employees

20+
Locations around the globe

Across
100+
Countries



B. OUR BUSINESS

Aristocrat Gaming is a leading premium provider of casino games and innovative gaming technology. Operating across three geographic divisions – 1) the Americas, 2) Europe, Middle East and Africa (**EMEA**), and 3) Australia, New Zealand and Asia (**APAC**) – we deliver end-to-end solutions to customers in more than 300 licensed jurisdictions and over 100 countries around the world. Aristocrat Gaming supports every facet of gaming floor operations, from product to sales, systems and service (**Aristocrat Gaming or Gaming**). We further strive to lead in the promotion of responsible gameplay, as part of ensuring a vibrant and sustainable industry.

The Group integrates (assembles) EGMs and gaming systems in Australia, the USA, Macau Special Administrative Region (**SAR**), and the UK via local entities in the Group, including ATEL in the UK and the Aristocrat Australian Reporting Entities in Australia.

The Group's Gaming business also includes Video Gaming Technologies Inc. (**VGT**). VGT is a leading developer, integrator and distributor of Class II (bingo-based) casino games in North America, largely to tribal gaming customers.

Aristocrat Gaming has distribution arrangements in the Americas (including North America and Latin America), EMEA and APAC, through which our EGMs and games are sold to distributors who then market and sell our EGMs and games to customers in each location. In Australia and New Zealand, new EGMs and games are predominately sold directly by Aristocrat Gaming sales representatives to end customers.

Aristocrat also has a globally operating, mobile-first digital games business, Pixel United, which provides free-to-play social casino, role-play, strategy, casual and social games to millions of customers around the world each day. Pixel United is comprised of three key business units:

- Product Madness, a top global developer of social casino and casual mobile games, based in the UK;
- Plarium, a mobile and web-based developer of role play, strategy and casual games, headquartered in Israel; and
- Big Fish Games, a global developer of popular casual games across multiple genres, based in the USA.

In Financial Year 2022, Aristocrat launched its dedicated online real money gaming (**RMG**) and customer experience solutions business (formerly a part of the Gaming business), now known as Anaxi. This also includes the acquisition of Roxor Gaming Limited (**Roxor**), a UK-based business-to-business online RMG supplier, under the Anaxi brand. We are currently working to integrate Anaxi into Aristocrat's enterprise-wide anti-modern slavery program, and this work will continue in Financial Year 2023.

C. OUR GROUP-WIDE APPROACH TO MODERN SLAVERY COMPLIANCE

While the Group is large, diverse and global, Aristocrat is committed to developing, maintaining, and continually improving a robust, enterprise-wide response to modern slavery.

Subject to any limited exceptions noted in this Statement, all entities in the Group are required to comply with our anti-modern slavery policies and procedures, which may be modified or localised to ensure they are “fit for purpose” based on specific business requirements, local laws and modern slavery risk profiles.



II. What we do: Our operations and supply chain

A. OUR OPERATIONS

1. Aristocrat Australia

ALL, Aristocrat International Pty Ltd and System 7000 Pty Ltd, which comprise three out of the four Aristocrat Australian Reporting Entities, are all holding companies only and do not carry out operations themselves. Aristocrat Technologies Australia Pty Limited (**ATA**) is the only operational entity.

ATA's principal activities include the integration (assembly), marketing and sale of EGMs and ancillary equipment and services, predominantly in Australia. This includes at our integration facility located in Sydney, Australia for integration (assembly) and final configuration of EGMs. Some Aristocrat Australian Reporting Entities also own or control other Group entities which carry out similar activities in different jurisdictions.

Additionally, some Aristocrat Australian Reporting Entities:

- are heavily involved in product design and development at our corporate offices in Sydney; or
- provide back-end functions to other Group entities.

During Financial Year 2022, ATA had approximately 1030 workers. About 93 per cent were full-time or part-time permanent employees, and the remainder were contingent workers, including temporary, agency or contracted workers. In the same period, about 99 per cent of permanent and contingent workers of ATA were based in Australia. The other Aristocrat Australian Reporting Entities did not employ any workers.

Some Aristocrat Australian Reporting Entities also own, or control Group entities based in other locations which employ workers. The map in Section I.B provides general information about the locations of our Group workforce.

Financial Year 2022
Approx. 1030 employees



93%

full-time or part-time permanent employees



99%

of permanent/contingent workers were based in Australia

A. OUR OPERATIONS

Financial Year 2022
Approx. 70 employees



90%

Full-time or part-time permanent employees



83%

of permanent/contingent workers were based in UK and Spain

Financial Year 2022
Approx. 850 employees



80%

Full-time or part-time permanent employees



50%

of permanent/contingent workers were based in UK

2. ATEL

ATEL's principal activities are the integration (assembly), marketing and sale of EGMs and related equipment and services. ATEL does business in, or has a permanent and contingent workforce residing in, the UK, Spain, Cyprus, France, the Netherlands, Germany, Croatia and South Africa. Its operations do not include Pixel United, VGT or Anaxi.

During Financial Year 2022, ATEL and its subsidiary had approximately 70 workers. Almost 90 per cent of these workers were full-time or part-time permanent employees; the remaining workers were contingent workers, including temporary, agency or contracted workers. In the same period, almost 83 per cent of the permanent and contingent workers of ATEL and its subsidiary were based in the UK and Spain.

3. PML

PML's principal activities are to provide development, operational and support services in respect of free to play, social and casual games which are published by a related entity, Product Madness, Inc., which is a company incorporated in the USA. PML's activities are supported by its subsidiaries located in Ukraine, France, Poland, Spain, Israel and Canada.

During Financial Year 2022, PML and its subsidiaries had approximately 850 workers based in the UK, Ukraine, Spain, Canada, Belarus, Poland, USA and Israel. More than 80 per cent of the workers were full-time or part-time permanent employees; the remaining workers were contingent workers, including temporary, agency or contracted workers. In the same period, almost 50 per cent of the permanent and contingent workers of PML and its subsidiaries were based in the UK.

PML employees and contingent workers were impacted by the conflict in Ukraine, with many voluntarily relocating. For further information, see Sections III.A.(1) and VII.C.(1).

4. Charitable giving

Building stronger and sustainable communities is something we are passionate about at Aristocrat and it goes to the heart of our 'Good Business, Good Citizen' value. Aristocrat CARES is our employee-led corporate community investment program, empowering and supporting our people to contribute time, financial support and leadership to community organisations. The Aristocrat CARES program operates across our global business and the organisations we support are chosen by our employees in the communities where we work and live.

In Financial Year 2022, as part of its charitable activities, Aristocrat CARES continued its financial support for the Cupcake Girls by supporting on-site therapy and holistic services for victims of the sex industry. Another example of Aristocrat CARES' financial support is to Unshakeable, a non-profit organisation serving women in recovery from homelessness, domestic violence, substance addiction and human trafficking. This financial support was provided through contributions to Unshakeable's educational and recovery courses. The Group will continue to assess current and future charitable opportunities that relate to potential modern slavery victims.

For more information, and details of our community contribution in Financial Year 2022, please see www.aristocrat.com/sustainability.

B. OUR SUPPLY CHAINS

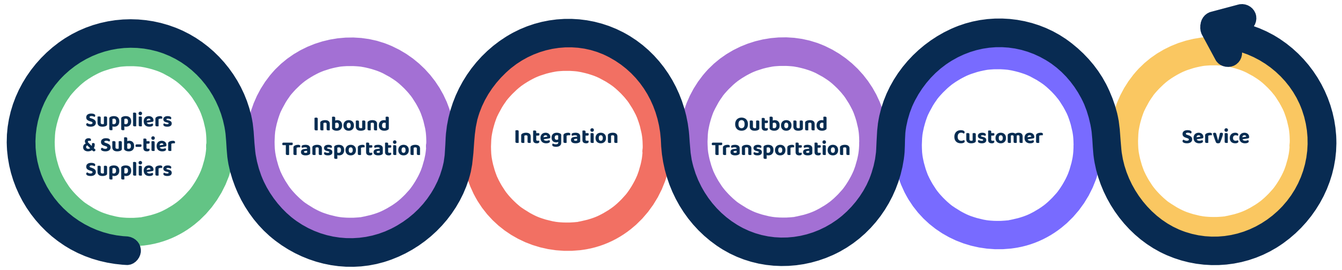
Given the diverse nature of our businesses, the Group has several supply chains that support the delivery of value to our customers.

1. Critical products (Gaming)

In this reporting period, approximately 94 per cent of our spend for Aristocrat Gaming came from 34 key direct suppliers and 15 managed sub-tier suppliers (**Key Direct Suppliers and Sub-Tier Suppliers**). The 15 identified sub-tier suppliers (also referred to as specified component suppliers) are suppliers of critical sub-tier products where Aristocrat takes full responsibility for the selection, approval and commercial negotiations with those sub-tier suppliers. For their operations and business, ATEL and the applicable Aristocrat Australian Reporting Entities source the components for EGMs and related equipment from the Group supply chain.

The graphic on the right shows the Direct Gaming Supply Chain.

Direct Gaming Supply Chain



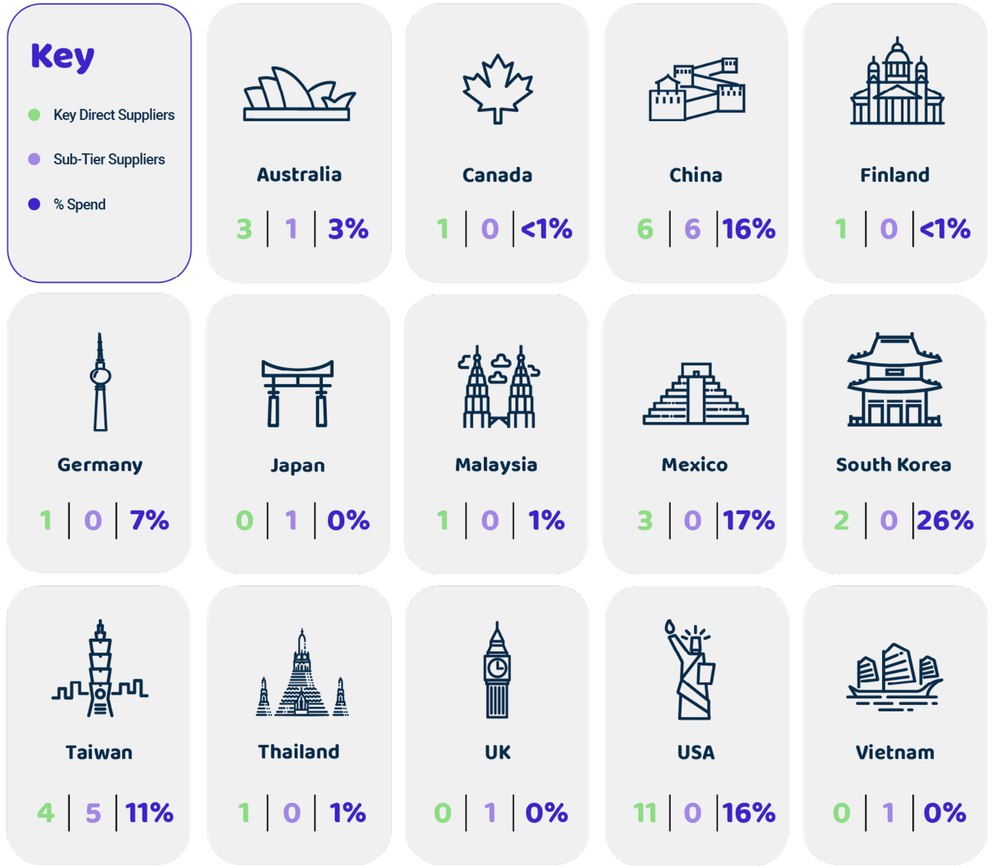
B. OUR SUPPLY CHAINS

a. Location of suppliers

The largest Key Direct Suppliers and Sub-Tier Suppliers by value are located in North America, Australia and East Asia (see graphics on the right which illustrate where our Key Direct Suppliers and Sub-Tier Suppliers are located).

Note: Suppliers have been categorised as sub-tier suppliers if they supply the majority of their products to Aristocrat's direct suppliers and not to Aristocrat. In some cases, the identified sub-tier suppliers may also provide additional products or spare parts directly to Aristocrat. Where '0'% of spend is shown for a sub-tier product category in the graphic, this indicates all products supplied by these sub-tier suppliers are supplied to Aristocrat's direct suppliers and all relevant spend is captured at the direct supplier level.

Key Direct Suppliers and Sub - Tier Suppliers



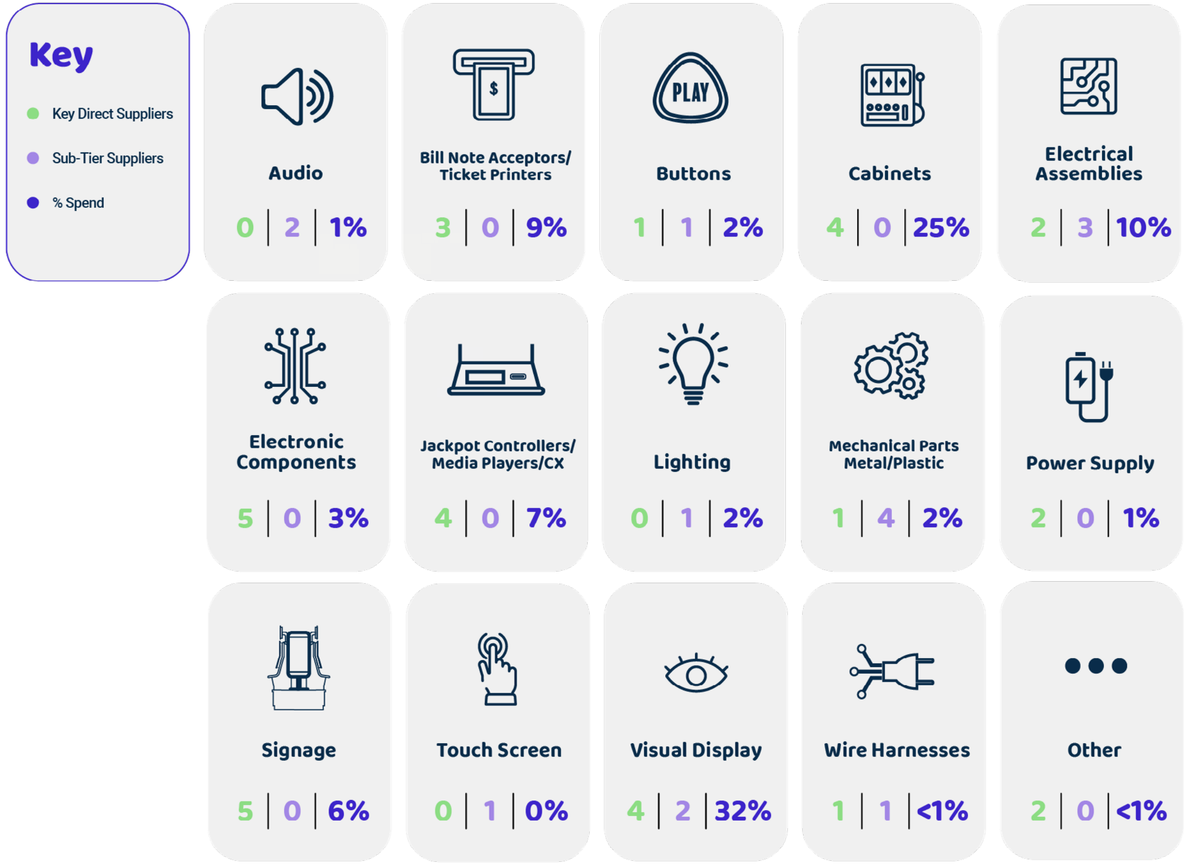
B. OUR SUPPLY CHAINS

b. Components

Aristocrat Gaming acquires critical products from the Key Direct Suppliers and Sub-Tier Suppliers, as listed in the categories shown:

Note: Suppliers have been categorised as sub-tier suppliers if they supply the majority of their products to Aristocrat's direct suppliers and not to Aristocrat. In some cases, the identified sub-tier suppliers may also provide additional products or spare parts directly to Aristocrat. Where '0'% of spend is shown for a sub-tier product category in the graphic, this indicates all products supplied by these sub-tier suppliers are supplied to Aristocrat's direct suppliers and all relevant spend is captured at the direct supplier level.

Key Direct Suppliers and Sub - Tier Suppliers

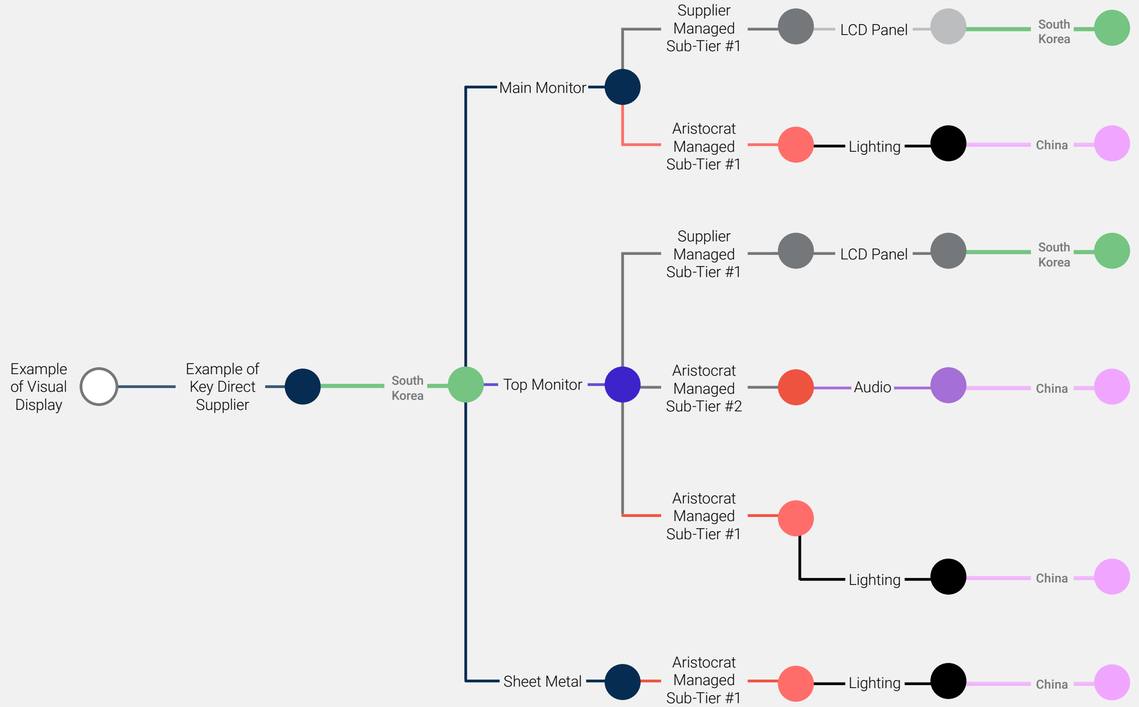


B. OUR SUPPLY CHAINS

c. Suppliers beyond Key Direct Suppliers and Sub-Tier Suppliers

Aristocrat recognises that modern slavery is a possible risk element within the Group's business resiliency strategy. Aristocrat has formed a dedicated Resiliency team to address this risk and business strategy. Both the Anti-Modern Slavery Working Group (**Working Group**) and the Resiliency team are working to better understand the shared risks within the supply chains for our Key Direct Suppliers and Sub-Tier Suppliers. As the Resiliency team maps business critical components and their suppliers within the supply chain using data visualisation technology, the teams are collaborating to understand how this data can also inform where there are higher risks for modern slavery based on the nature of EGM components and geographical locations of suppliers beyond our Key Direct Suppliers and Sub-Tier Suppliers. The graphic on the right shows a visual display example of the data mapping being done by the Resiliency team. The mapping provides visibility of components and geographical location of suppliers, from our Key Direct Suppliers and Sub-Tier Suppliers, and also includes supplier managed sub-tiers.

Resiliency Mapping of Key Direct Suppliers and Sub-Tier Suppliers supply chain



B. OUR SUPPLY CHAINS

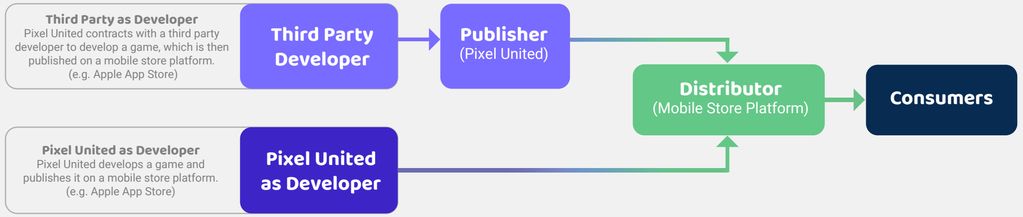
2. Pixel United

The Pixel United businesses have two types of supply chains (as shown in the diagrams below):

Pixel United supply chains

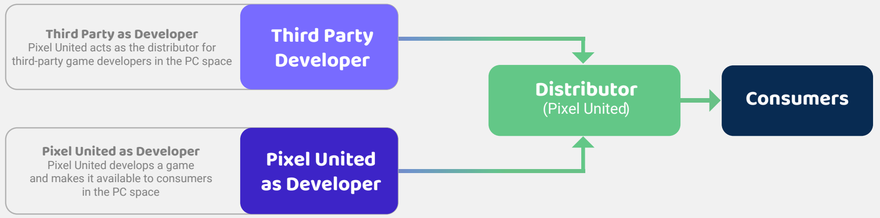
Mobile-Driven Value Chain

The 'Mobile-Driven Value Chain', by which the relevant Pixel United business unit makes mobile games available for download on third-party online store platforms, such as the Apple App Store or Google Play;



Online Value Chain

The 'Online Value Chain', by which the relevant Pixel United business unit offers mobile games for download or play on its own website.



In each instance, the games may be developed by a third-party developer (contracted by Pixel United) or by the individual Pixel United business unit itself.

B. OUR SUPPLY CHAINS

As the core business of Pixel United is digital mobile game development and marketing, the key direct suppliers to Pixel United are primarily comprised of digital game developers, software developers, IT suppliers and suppliers of related services (such as marketing, sound recording and voiceover services).

3. Anaxi

As the Anaxi business was launched during the current reporting period, we are starting our work with Anaxi to identify their key direct suppliers and this work will continue in Financial Year 2023 and beyond.

4. Indirect Sourcing

To support Aristocrat Gaming, Pixel United and Anaxi, the Group engages a range of other suppliers who supply goods or services that are not integrated or used in our gaming products nor in relation to digital game development. These are suppliers from whom we purchase goods or services to support our day-to-day operations, for example, travel, technology, utilities, facility management, learning and development, marketing, professional services and more (**Indirect Sourcing**).

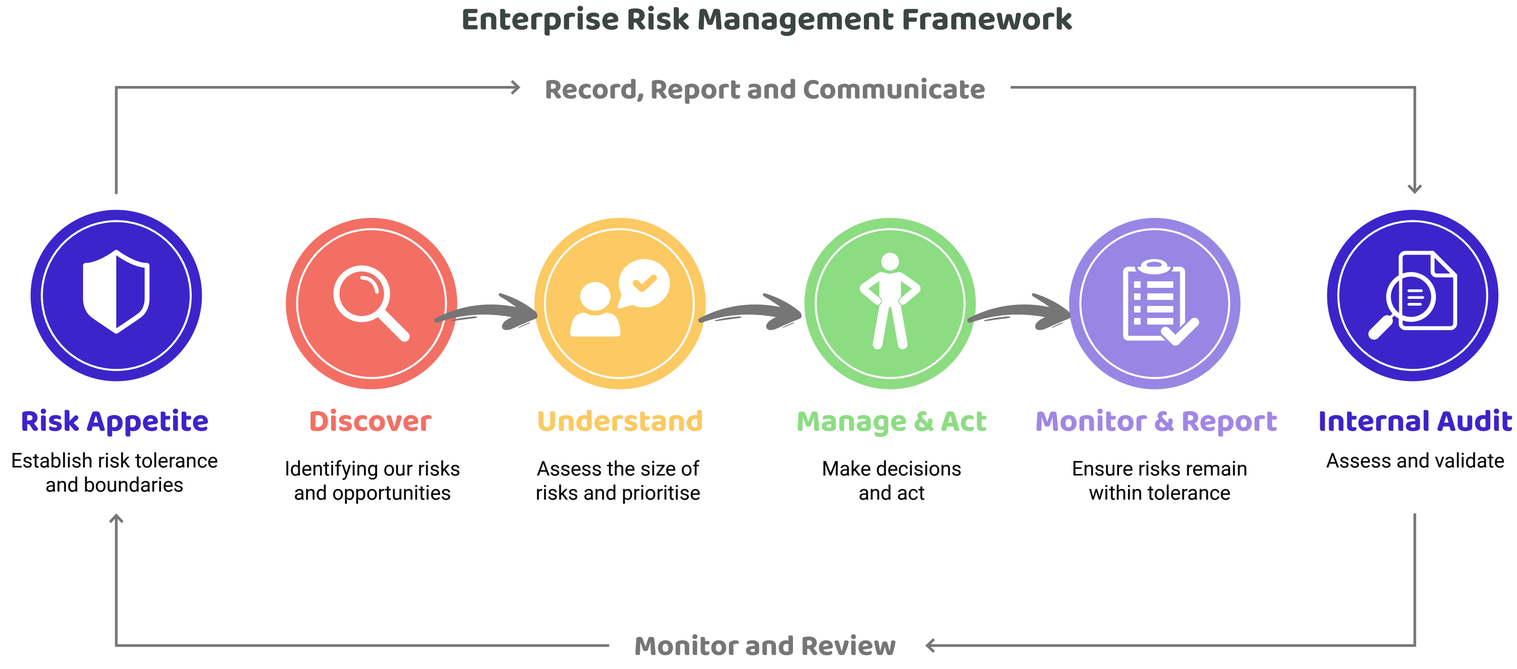
In Financial Year 2022, the Group has progressed its risk assessment work for Indirect Sourcing and more information about our efforts is contained in Section III.B.(2).

Pixel United Key Suppliers

	No. of key direct suppliers (approx.)	Locations of key direct suppliers	Services Provided
PLARIUM	12	Denmark, Ireland, Israel, Ukraine, USA	The key direct suppliers identified by each of the Pixel United operating companies provide goods and services to each of them that fall within one or more of the following categories: • game development, systems design services and live operations support; • cloud subscription services; • database services and data storage; • software licenses; • quality assurance services for game software; • computer equipment and software; • marketing and creation of content services; • IT support services; • platform services for ads and marketing; and • network and platform services for app developers.
BIG FISH	24	Armenia, Belarus, Canada, Cyprus, Romania, Ukraine, USA	
PRODUCT MADNESS	5	Ireland, UK, USA	

III. The risks of modern slavery in our operations and supply chains

The Group's Enterprise Risk Management Framework (the **Framework**) supports the timely identification, evaluation, reporting and treatment of material risks so that risks remain within acceptable thresholds as set by the Board of Directors. The Framework encompasses the steps illustrated in the diagram below:



The Group's approach to identifying modern slavery risks in our operations and supply chains is based on three key indicators:

1. Industry, sector and product risk indicators:

We consider the risk that some industries and sectors may be more susceptible to modern slavery, taking into account the composition of the workforce. For example, we recognise that risks may be greater in industries and sectors that are heavily reliant on temporary, unskilled, low-paid or migrant workers. We also consider sources such as the US Department of Labor's List of Goods Produced by Child Labor or Forced Labor.

2. Geographic risk indicators:

We consider the risk that some countries in which we operate are reported to have a higher prevalence of modern slavery compared to other countries. We base these assessments on the Walk Free 2018 Global Slavery Index (**Global Slavery Index 2018**) and have assigned risk ratings to our countries of operation based on that index.

Aristocrat's Geographic Risk Categorisation

In summary, countries ranked 1 to 56 on the Global Slavery Index 2018 are treated as higher risk, countries ranked 57 to 111 on the Global Slavery Index 2018 are treated as medium risk, and countries ranked 112 to 167 on the Global Slavery Index 2018 are treated as lower risk.

3. Worker freedom and working condition indicators:

Finally, we consider indicators that workers may not have freedom of movement, including freedom to leave their job, that may signal that working conditions may be poor.



The likelihood and impact of potential risks identified are assessed using the Group's enterprise risk rating tables to determine the significance of each risk. We consider existing controls in place to determine if further mitigating actions are required to bring the risk to within our tolerance level. We describe additional aspects of our approach to addressing potential modern slavery risks in Section IV below.

In Financial Year 2022, we did not identify any specific incidents of modern slavery in our operations or supply chains. However, in the Sections below, we identify the risks of modern slavery practices, meaning the potential for the Group to *cause* or *contribute to* modern slavery through our operations, or to be *directly linked* to modern slavery through our supply chains, as these concepts are defined in the UN Guiding Principles on Business and Human Rights. Where we have used these terms below, they are italicised.

Summary of our modern slavery risks

In summary, we have identified the following potential modern slavery risks:

In our Operations...



Through our engagement of contractors & temporary workers

The Group could potentially be *directly linked* to modern slavery, as the compliance practices of recruitment agencies and other third parties may not be fully visible to Aristocrat.



Through our corporate activities

Aristocrat could potentially *contribute to* or be *directly linked* to modern slavery if we acquire or invest in companies that themselves have significant modern slavery risks or engage in modern slavery practices.



Through our charitable donations

Aristocrat could potentially *contribute to* modern slavery if goods that we donate have been manufactured by or sourced from suppliers that engage in modern slavery practices.

In our Supply Chains...

Through our purchase of products & services

The Group could potentially *contribute to* or be *directly linked* to modern slavery if we purchase products or services from higher risk industries or sectors (such as electronics and cleaning) and/or from suppliers in higher risk locations (such as with our distribution and transportation arrangements in Malaysia, the Philippines and some African countries).

These potential risks are discussed in further detail below.

A. POTENTIAL RISKS IN OUR OPERATIONS

The Group further progressed its risk assessment on its own operations during this reporting period, focusing on the following areas identified in the previous reporting period:

- the Group's employment practices (including employment of direct/permanent workers and engagement of contractors/temporary workers); and
- charitable donations of goods by the Group.

The Group also identified other areas of focus, including our M&A. Some risk assessment work was done in this reporting period with respect to M&A (see Section III.A.(4)), while other areas will be progressed in future reporting periods.

1. Employment of direct / permanent workers

Consistent with the previous reporting period, the majority of the Group's employees are employed in locations that have been identified in the Global Slavery Index 2018 as having a lower prevalence of modern slavery, including Canada, New Zealand, Australia, the USA, Argentina, the UK, the European Union and Mexico. In contrast to the majority of the Group's employees, some of our employees are employed in locations with a medium or higher prevalence of modern slavery, such as Ukraine, Poland, Macau SAR and India. We also generally aim for employment terms that are above minimum global contractual standards for all employees, even where those minimum standards may exceed local law requirements. Employee pay is governed by the Aristocrat Global Reward policy that specifies median market pay for local and regional locations.

Support for employees impacted by the Ukraine conflict

ARISTOCRAT cares

Since the outbreak of the conflict in February 2022, Aristocrat has assisted a significant number of our Ukraine-based employees and their families to voluntarily relocate, either internationally or to safer locations within the country. A special task force was set up in Poland to assist staff and families on the ground. Aristocrat provided and continues to provide transport, visas and legal help, housing and settling-in assistance for relocated staff. The company continues to make every possible effort to support employees and their families that remain in the country. This includes providing funds, shelter, emergency supplies and other direct aid. For further information on how the conflict has impacted our business, see Section VII.C.(1).

Within the APAC region, permanent and temporary employees are engaged through either individual contracts or under collective Enterprise Agreements. The Enterprise Agreements set out pay and conditions of employment. The certification process for these Agreements ensures employees are better off overall when compared to the relevant legislated minimum pay and conditions. For employees under individual contracts, we undertake regular reviews to also ensure that their pay and employment conditions are equal to or above the legislative minimums relevant to their classifications in the relevant modern awards. Further, all casual or contract staff are paid on the same terms as any relevant Aristocrat Enterprise Agreement or in accordance with at least the minimum defined pay rates for their classification.

For all other regions (including the Americas, India and Europe), we review our employment agreements and practices in consultation with our external lawyers, as necessary, to ensure we are compliant with all laws in the applicable jurisdictions.

Aside from the movement of employees due to the Ukraine conflict, we did not identify any significant risks in connection with the employment of direct/permanent workers or any potential for the Group to *cause* or *contribute to* modern slavery risks through its employment practices. The impact of the Ukraine conflict on employees was identified as a risk area due to the correlation between conflict and the vulnerability of civilian populations to modern slavery. However, as noted above, Aristocrat has taken significant steps to ensure the safety, security and wellbeing of its employees impacted by the Ukraine conflict.



Great Place To Work® Certified SEP 2021-SEP 2022 AUS ™

Great Place To Work® Certified SEP 2021-SEP 2022 INDIA ™

Great Place To Work® Certified SEP 2021-SEP 2022 USA ™

Great Place to Work certification

In 2022, in addition to its sixth Great Place to Work® (GPTW) certification, Aristocrat India was recognised as one of the best workplaces in three categories: 1) Diversity, Equity and Inclusion, 2) Health & Wellness, and 3) IT & IT-BPM. Great Place to Work® is the global authority on building, sustaining and recognising High-Trust, High-Performance Culture at workplaces. It conducts national recognition programs based on surveys with rigorous methodology and validated employee feedback. To achieve these recognitions, Aristocrat provided survey feedback from employees as well as detailed company information including People & Culture practices. The employee survey measured employees' perceptions of working conditions and workplace culture, as well as their daily workplace experience, to ensure that their leaders (and counterparts) are credible, respectful and fair. These GPTW awards reflect that Aristocrat has high employment standards and working conditions (including the provision of a safe working environment, and fair remuneration and leave entitlements), positive employee culture, and adherence by management to honest and ethical business practices.

PRODUCT MADNESS

Product Madness awards

Additionally, Product Madness, which is part of Pixel United, received gold and silver awards at the prestigious Stevie Awards for Great Employers in the HR Team Categories. The Stevie Awards recognise the world's best employers and the teams and initiatives that help to create and drive great places to work. The Product Madness team was awarded the Gold Stevie Award for Engagement/Happiness Team of the Year for 2022 and the Silver Stevie Award for Recruiting or Talent Acquisition Team of the Year for 2022. Like the GPTW awards, these awards reflect the Group's high employment standards, people-first culture, and commitment to employee wellbeing.



A. POTENTIAL RISKS IN OUR OPERATIONS

2. Engagement of contractors / temporary workers

Building on the initial risk assessment work on the engagement of contractors and temporary workers carried out in the previous reporting period with respect to VGT and Pixel United, in Financial Year 2022 this work was expanded to other parts of our business as part of our risk assessment of Indirect Sourcing and our internal operations (discussed further in Section III.B.(2)). This was identified as an area where the Group could potentially be *directly linked* to modern slavery risks due to the lower degree of visibility that employer companies may have in relation to payment arrangements and whether recruitment agencies are abiding by applicable employment laws (particularly in countries with a higher prevalence of modern slavery).

As the Group has contractors and temporary workers in some higher risk countries, such as Belarus, India, Ukraine and Turkey, this has been a particular area of focus in Financial Year 2022. For Aristocrat Gaming, we have updated all our key staffing agreement templates for contingent workers globally to include specific clauses addressing modern slavery risks, and we intend to continue implementing these updates in the Group's other staffing and similar agreements, as appropriate, in Financial Year 2023 (discussed further in Section IV.J.(2)). We have also developed a standalone risk questionnaire for our People & Culture teams globally to obtain further information on contingent worker engagements so that we can identify any additional modern slavery risks and assess what additional risk mitigation measures (if any) may be required. Based on our enquiries to-date, no material modern slavery risks have been identified. Additionally, when the Group opens an office in a new location and workers are initially engaged as casual/contract workers or using an 'employer of record' third-party arrangement, generally these workers are then transitioned to permanent employees once the entity has been fully established, generally within the first year. The risk assessment associated with our engagement of contractors and temporary workers is expected to continue in Financial Year 2023.

ARISTOCRAT cares

Toiletry Drive

Aristocrat CARES launched a toiletry drive where employees could donate toiletry products, which were then donated to a charitable organisation. Despite the lower modern slavery risk associated with toiletries overall, it was recognised that some of the products used to produce toiletries (such as cotton and palm oil) can carry a higher modern slavery risk, including the risk of child labour or forced labour. As the goods were purchased directly by employees (and not by Aristocrat), there was limited scope for Aristocrat to review or assess the companies/manufacturers where the goods were purchased from (for the purposes of investigating modern slavery risk). However, guidance was provided around product-specific accreditation schemes (such as the eco-label adopted by the Roundtable on Sustainable Palm Oil, which signals that a product or brand uses sustainable palm oil that includes respect for and compliance with workers' rights and conditions) as a way to encourage employees to purchase more sustainable products and therefore minimise the potential for Aristocrat to *contribute to* modern slavery through our charitable donations.

A. POTENTIAL RISKS IN OUR OPERATIONS

3. Charitable donations

Further analysis of goods donations by the Group was carried out in Financial Year 2022 to identify any further potential modern slavery risks arising from these activities.

As part of our risk assessment of Indirect Sourcing and our internal operations (discussed further in Section III.B.(2)), specific questions were included regarding donations of goods. This risk assessment was first conducted for higher risk locations in Financial Year 2022 and will also be conducted for medium and lower-risk locations in Financial Year 2023 and beyond. In 2022, one donation of IT equipment in India was subject to further review and assessment by the Compliance team, to identify whether the relevant supplier had been subject to any litigation, enforcement actions or adverse media reports concerning modern slavery issues. (For further details of these Compliance checks, see Item 3.3 in Section IV.B.(1).) The outcome of the internal assessment was that no issues relating to modern slavery were identified with respect to the specific donation or supplier.

Following its analysis of goods donations by the Group, Aristocrat has determined that the modern slavery risk may be heightened, and Aristocrat could potentially *contribute to* modern slavery, when:

- the relevant goods, or components of the goods, are on lists such as the U.S. Department of Labor List of Goods Produced by Child or Forced Labor – such as toiletries containing palm oil; and
- there are allegations of poor or unlawful employment practices, which could be an indicator of potential modern slavery practices by a supplier.

The case studies on the previous page and this page refer to two examples of donations of potentially higher risk goods that were identified in this reporting period. In each of the examples, further enquiries revealed that the relevant Aristocrat entity did not have a direct contractual relationship with the relevant supplier, but that possible modern slavery issues were addressed as required.

Employee Gift Project

The Group sourced toys to be gifted to the children of employees affected by the Ukraine conflict. Prior to the purchase, the Compliance team conducted a review of each of the proposed vendors and toy brands to identify any adverse reports from a modern slavery perspective. (For further details on these Compliance checks, see Item 3.3 in Section IV.B.(1).) One of the toy brands had reported issues related to hiring of unlawful workers, which was an indicator of potential modern slavery risks. As the Group did not have any relationship with the toy brand that would allow for further investigation or influence, the preferred approach was to not purchase any items from that brand as a way to minimise the potential for Aristocrat to *contribute to* modern slavery through its sourcing.

4. Further risk assessment

In Financial Year 2022, we identified our M&A activities as an area where the Group could potentially *contribute to* modern slavery if the target companies that we engage with have significant modern slavery risks (for example, in their own operations or supply chains) or are found to engage in modern slavery practices. For a summary of the actions taken to address this risk, see Section IV.K.

In this reporting period, we also commenced our assessment of modern slavery risks in all countries in which we operate. Though the initial assessments have not identified any additional modern slavery risks in our internal operations, we have identified our distribution arrangements as another area where Aristocrat could potentially *contribute to*, or be *directly linked* with, modern slavery. For further discussion on the potential modern slavery risks associated with our distribution arrangements, see Section III.B.(2).

Other areas of potential risk will be identified and assessed in future reporting periods.

B. POTENTIAL RISKS IN OUR SUPPLY CHAINS

1. Key suppliers

The following table summarises the areas in our supply chains where the Group could potentially be *directly linked* to modern slavery risks. This also includes the findings from the risk assessment for Product Madness, which was completed in Financial Year 2022. We plan to continue to monitor the risks associated with our key suppliers in Financial Year 2023 and beyond with a view to implementing appropriate measures to address those risks, noting that these risks may change and evolve based on a variety of global factors, including economic and geopolitical conditions.

	Industry, sector and product risk	Geographic risk	Restricted worker freedoms and poor working conditions
Critical products - Gaming	• Suppliers of electronic components are potentially higher risk, due to reported forced labour and child labour in electronics factories, particularly in some Asian countries. • The electronic components sourced by Aristocrat are not included in the Global Slavery Index 2018's category of "electronic components", which includes only consumer electronics such as laptops, computers and mobile phones, while Aristocrat's electronic products are different, being low volume, industry-specific, non-consumer products. However, Aristocrat continues to monitor this sector given the relatively high-risk level associated with "electronic components" generally.	• Most Key Direct Suppliers and Sub-Tier Suppliers operate in locations that have the lowest or medium prevalence of modern slavery (see map below). • Only a small number of Key Direct Suppliers and Sub-Tier Suppliers operate in higher prevalence locations, but none are located in the top 20 countries that were identified in the Global Slavery Index 2018 as having the highest prevalence of modern slavery. • We do not have any Key Direct Suppliers or Sub-Tier Suppliers in the Xinjiang region of China, but we have been closely monitoring forced labour risks in China through our supplier survey (discussed in Item 2.2 of Section IV.B.(1) and Section IV.I.(2)(a)).	• We have not identified any specific incidents involving restricted worker freedoms or poor working conditions as part of our supplier survey (discussed in Item 2.2 of Section IV.B.(1) and Section IV.I.(2)(a)). • We recognise that some locations in which our Key Direct Suppliers and Sub-Tier Suppliers operate may afford relatively limited legal protections to workers, but one way in which we mitigate this risk (in addition to other mitigation actions discussed in this Statement) is by requiring suppliers to use their best efforts to comply with harmonised minimum standards globally, as set out in our Supplier Code of Conduct (discussed in Item 1.4 of Section IV.B.(1)).
Pixel United	• Key direct suppliers are primarily digital game/software developers, IT suppliers, and suppliers of related services (e.g., creative content services as set out in more detail in Section II.B.(2)), none of which have been identified as higher risk suppliers. • In relation to IT suppliers, all the Pixel United businesses generally source off-the-shelf technologies from large, reputable suppliers on standard terms and conditions, so they do not have great leverage to negotiate bespoke modern slavery provisions in supply contracts.	• Some suppliers are located in higher risk countries, such as Belarus, Ukraine and Romania. In Financial Year 2022, all Pixel United supplier relationships in Russia and Belarus were placed under review (with some being suspended) as a result of the Ukraine conflict. • However, the risk assessments indicated that all Pixel United businesses ensure that all their key direct suppliers are engaged via contractual arrangements which include necessary protections and require suppliers to comply with all local laws (including laws relating to employment and working conditions).	• Given the services for which these suppliers are engaged (primarily software development and IT-related services), and the contractual standards and protections in place with these suppliers, the Group did not identify any material risks of restricted worker freedoms or poor working conditions which could indicate specific modern slavery risks.

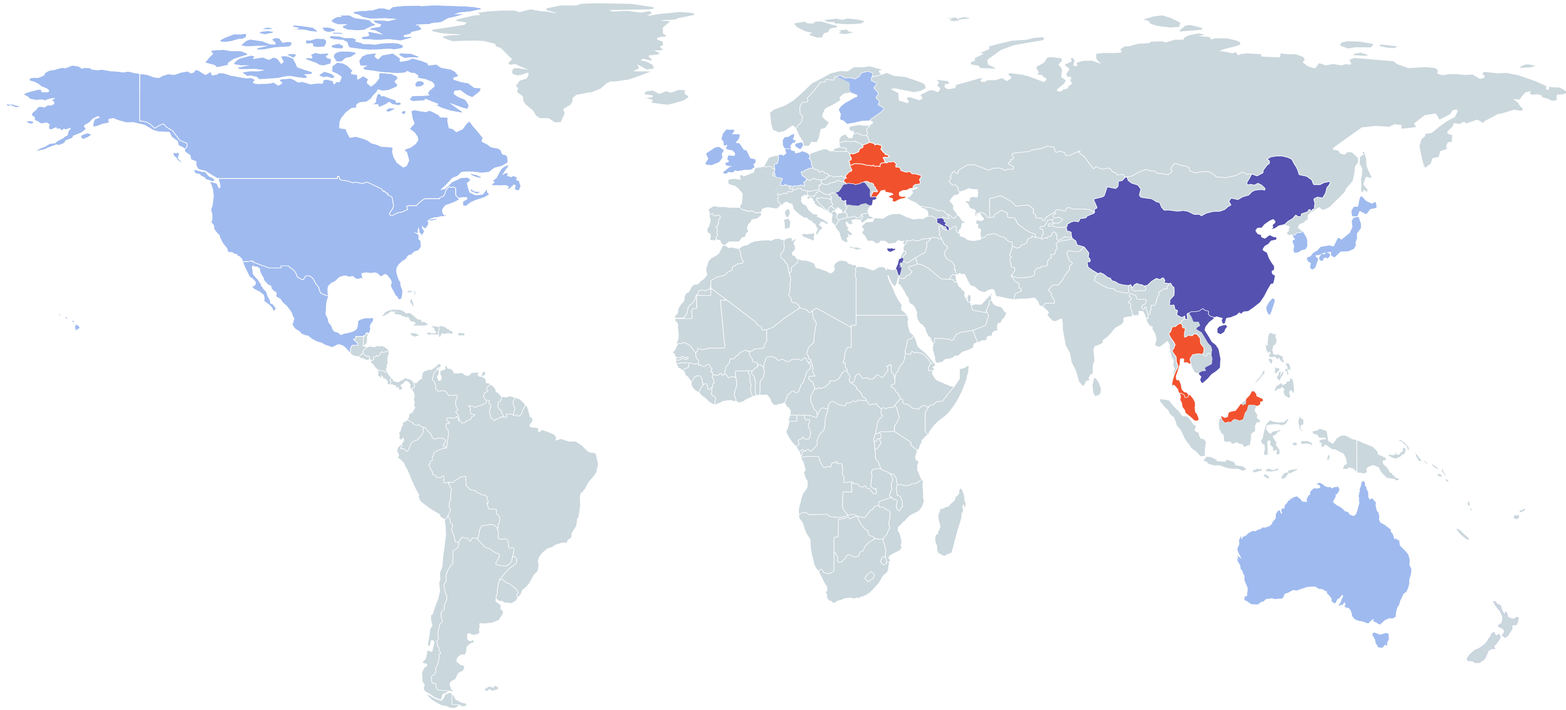
B. POTENTIAL RISKS IN OUR SUPPLY CHAINS

Location of Key Direct Suppliers and Sub-Tier Suppliers and Pixel United key suppliers

Only a small number of Key Direct Suppliers and Sub-Tier Suppliers and Pixel United key suppliers operate in locations with a higher prevalence of modern slavery.

Levels of risk

Lower	Medium	Higher
Australia	Armenia	Belarus
Canada	China	Malaysia
Denmark	Cyprus	Thailand
Finland	Israel	Ukraine
Germany	Romania	
Ireland	Vietnam	
Japan		
Mexico		
South Korea		
Taiwan		
UK		
USA		



B. POTENTIAL RISKS IN OUR SUPPLY CHAINS

2. Indirect Sourcing

In the previous reporting period, the Group conducted a preliminary assessment to evaluate modern slavery risks associated with Indirect Sourcing and identified the following sectors, products and services as areas of focus where the Group could potentially *contribute to* or be *directly linked* to modern slavery risks:

- cleaning services;
- facilities management services (including catering/hospitality services and construction/maintenance services);
- IT equipment;
- other office equipment (e.g., stationery);
- materials for trade shows and other marketing events (e.g., uniforms, show bags, marketing paraphernalia);
- personal protective equipment for workers during the COVID-19 pandemic; and
- warehousing, distribution and transportation services.

In Financial Year 2022, risk assessments were progressed in the areas set out in the table below (for Aristocrat Gaming and Pixel United). As per our prioritised risk-based approach:

- the risk assessments for cleaning, catering/hospitality and construction/maintenance services focused first on locations with a higher risk of modern slavery, including India, the Philippines, Croatia, Greece, Belarus and Turkey. The risk assessment for Ukraine could not be completed due to the ongoing conflict and the resultant disruptions and changes within the Pixel United businesses, however we will aim to complete this assessment in future years depending on the future nature of the business in Ukraine;
- for distribution services, we considered our gaming operations globally and focused our risk assessment on higher risk locations in Africa and the APAC region; and
- the risk assessment for marketing materials focused first on Pixel United, given the larger number of trade shows within the digital gaming sector.



B. POTENTIAL RISKS IN OUR SUPPLY CHAINS

	Industry, sector and product risk	Geographic risk	Restricted worker freedoms and poor working conditions
Cleaning services 	• In the previous reporting period, cleaning services were identified as a potentially higher risk service, given the relatively lower-skilled, lower-paid nature of the work and the risk of deceptive recruitment and debt bondage in this sector. • The risk may be heightened when cleaning services are provided indirectly by third parties (e.g., property owners, building management or co-occupiers of office space).	• Apart from one cleaning supplier in Ukraine (for Plarium) prior to the conflict, none of the cleaning suppliers engaged by Plarium, Big Fish and Product Madness (either directly or indirectly) are located in higher risk countries nor any countries having the highest prevalence of modern slavery (based on the top 20 countries in the Global Slavery Index 2018). • The risk assessment for Belarus and Turkey was carried out for Product Madness only, as this is the only business that had some presence in those countries in Financial Year 2022 (through the engagement of contingent workers). However, no cleaning suppliers have been engaged in Belarus or Turkey. • For Aristocrat Gaming, the only higher risk location where cleaning suppliers are currently engaged is India. One supplier provides facilities management services for the upkeep and maintenance of our two offices in India, which includes cleaning services. Information regarding due diligence checks and contractual arrangements for this supplier is included in the next column. • No cleaning suppliers are currently engaged by Aristocrat, either directly or indirectly, in the other higher risk locations which were assessed in this reporting period (i.e. Philippines, Croatia and Greece).	• The assessment in the previous reporting period (for Plarium and Big Fish) and current reporting period (for Product Madness) identified that the majority of cleaning staff are either directly employed by Plarium or Product Madness (pursuant to employment agreements and in accordance with local laws) or, in the case of some Plarium and Product Madness cleaning staff and all Big Fish cleaning staff, engaged through a cleaning supplier (via a supplier agreement). In one location (Spain), Product Madness receives cleaning services via the property owner, and public authorities can conduct inspections of the property owner at any point to ensure employment conditions are being complied with. We are not aware of any such inspections having taken place yet. • In India, the cleaning supplier is directly engaged by Aristocrat via a contract which requires the supplier to comply with all statutory employment requirements. As part of the vendor setup process, checks are performed by Aristocrat (for example, in relation to employment and leave entitlements, insurances and working hours) to ensure the supplier is complying with working conditions as required by the relevant laws and standards.
Facilities management services (including catering / hospitality, construction / maintenance and security services) 	• These sectors were identified as higher risk given the reliance on casual/temporary workers, unskilled workers, and migrant workers, who may be more vulnerable to exploitation, including forced labour and debt bondage.	• Based on the risk assessments carried out in this reporting period, the only higher risk country in which Aristocrat currently has facilities management suppliers is India. These services are primarily provided by the same supplier that provides cleaning services (as discussed above), while security services are provided by another supplier. Information regarding due diligence checks and contractual arrangements for these suppliers is included in the next column. • No facilities management suppliers are currently engaged by Aristocrat, either directly or indirectly, in the other higher risk locations which were assessed in this reporting period (i.e. Philippines, Croatia, Greece, Belarus and Turkey).	• As noted above, the primary facilities management supplier for India is engaged directly by Aristocrat via a contract which requires the supplier to comply with all statutory employment requirements. • The security services provider for India is also engaged directly by Aristocrat via a contract which requires the supplier to carry out pre-employment screening and comply with all statutory employment requirements. • As noted above, checks are performed by Aristocrat as part of the vendor setup process (for example, in relation to employment and leave entitlements, insurances and working hours) to ensure the supplier is complying with working conditions as required by the relevant laws and standards.

B. POTENTIAL RISKS IN OUR SUPPLY CHAINS

	Industry, sector and product risk	Geographic risk	Restricted worker freedoms and poor working conditions
Warehousing, distribution and transportation services 	• The warehousing, logistics and transportation sectors were identified as higher risk due to the pressures on supply chains and the resultant demand for labour (particularly as a result of the COVID-19 pandemic), as well as the reliance on temporary and/or unskilled workers, and migrant workers.	• In the APAC region, Aristocrat Gaming has distribution arrangements in Malaysia and the Philippines, which are higher risk locations. There are also distribution arrangements in several African countries which are considered higher risk in terms of modern slavery. Information regarding due diligence checks and contractual arrangements for these distributors is included in the next column.	• Shipment of goods via sea is one area where there could potentially be poor working conditions. Further work is planned for Financial Year 2023 and beyond to assess this and other risks in relation to our distribution arrangements. • Prior to engagement, all distributors undergo detailed probity investigations by Aristocrat's Compliance team. These include checks to identify any material litigation, enforcement actions or adverse media reports, including related to modern slavery issues. Probity investigations are conducted annually for all distributors. • While Aristocrat generally contracts directly with distributors and requires the distributors to comply with all applicable laws in its agreements, further work is planned for Financial Year 2023 and beyond to continue to assess the risks associated with these services and determine the necessary actions to mitigate these risks, including implementation of ethical sourcing and modern slavery clauses in these agreements (see Section IV.J).
Materials for trade shows and other marketing events 	• Promotional products and branded merchandise were identified as higher risk products due to the generally low cost and high volumes associated with these products.	• Based on the risk assessments carried out in this reporting period, which focused on Pixel United (and not Aristocrat Gaming nor Anaxi) given the larger number of trade shows within the digital gaming sector, only Big Fish and Plarium currently source promotional products and merchandise for trade shows and other events. While the products are mainly sourced in the USA and Israel, there is a risk that the products could contain components or materials that are produced in higher risk locations (such as cotton from the Xinjiang region of China). Information regarding contractual arrangements for these suppliers is included in the next column.	• While Aristocrat generally contracts directly with suppliers of these products and requires the suppliers to comply with all applicable laws in its agreements, further work is planned for Financial Year 2023 and beyond to continue to assess the risks associated with these products and determine the necessary actions to mitigate these risks, including expansion of the risk assessment to products purchased for internal purposes, as well as implementation of ethical sourcing and modern slavery clauses in these agreements (see Section IV.J). • The implementation of such ethical sourcing and modern slavery clauses has already commenced for some areas of the business, such as Plarium, and will continue in the next reporting period.

The risk assessments for these areas and the other areas noted above will be further progressed in Financial Year 2023 and beyond in a prioritised manner, while also having regard to the Group's leverage to influence change.

IV. The actions we have taken to assess and address modern slavery risks, including due diligence and remediation processes

As set out in Section III, the Group's approach to identifying modern slavery risks in our operations and supply chain is based on three key indicators. In this Section, we provide further detail regarding our approach to assessing and addressing the identified risks. In summary:

- some of these measures — such as supplier probity checks — are focused on ***assessing risks*** associated with specific suppliers;
- other measures — such as our new Modern Slavery Incident Response Guide — are focused on ***addressing risks*** once they have arisen; and
- a small number of measures — such as the modern slavery supplier survey — serve the dual purpose of allowing us to ***both assess and address*** identified risks.



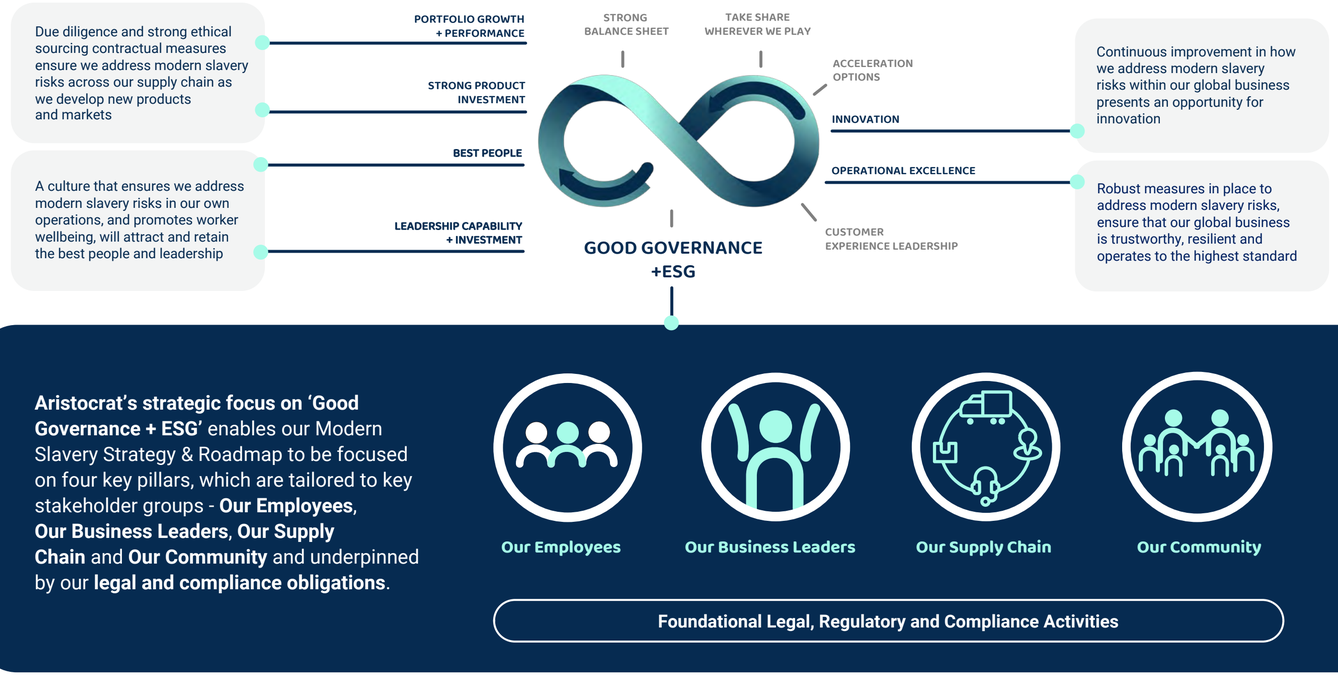
A. APPROACH TO ASSESSING AND ADDRESSING RISKS

Our governance structure and Framework underpin our approach. While the Group is large, diverse and global, we take an enterprise-wide approach to modern slavery compliance as part of our broader sustainability program. For further information on Aristocrat's sustainability priorities and initiatives, please refer to our 2022 Sustainability Disclosures.

All entities in the Group are required to comply with our policies and procedures in this space (with limited exceptions, as noted in this Statement), which may be modified or localised to ensure they are "fit for purpose" based on specific business requirements, local laws and modern slavery risk profiles. Our Framework is set out in Section III.

In Financial Year 2022, the Working Group developed a two-year strategy and roadmap for Aristocrat's global anti-modern slavery program (**Anti-Modern Slavery Strategy and Roadmap**). The strategy underpins the activities in the roadmap and guides our decision-making in relation to our anti-modern slavery program. The Anti-Modern Slavery Strategy and Roadmap forms part of, and supports, the Group's growth strategy, which is shown in the image on the right. Specifically, while the Anti-Modern Slavery Strategy and Roadmap touches all aspects of the Group's growth strategy through ensuring business sustainability, there are some aspects of the growth strategy that are more directly impacted, as shown on the right.

Aristocrat's growth strategy is supported by our Anti-Modern Slavery Program



A. APPROACH TO ASSESSING AND ADDRESSING RISKS

The diagram on the right shows our multi-tiered anti-modern slavery governance structure.

The Working Group's efforts align closely with a group of internal stakeholders who provide feedback to the Working Group (**Project Stakeholder Group**). The Project Stakeholder Group consists of representatives from different business functions as set out in the graphic above (which includes a non-exhaustive list of stakeholders).

In Financial Year 2022, to further engage and align with the business on Aristocrat's Anti-Modern Slavery Strategy and Roadmap, the Working Group established a network of 'Anti-Modern Slavery Champions' for each of the key Project Stakeholder Groups. These champions are the key points of contact between the individual business units and the Working Group on all modern slavery matters and their main responsibilities include:

- liaising with the Working Group to action initiatives within the Anti-Modern Slavery Strategy and Roadmap as relevant to each business unit;
- providing feedback to the Working Group on the Anti-Modern Slavery Strategy and Roadmap and other activities and communications to ensure continual improvement and alignment with the business; and
- contributing to and supporting the preparation of Aristocrat's annual modern slavery statement.

The shows actions that have been newly implemented in Financial Year 2022

Anti-Modern Slavery Governance Structure

Board of Directors

The applicable Boards of Directors provide oversight of the Group's strategy to address modern slavery, and approve Aristocrat's annual Modern Slavery Statement under the Australian and UK Modern Slavery laws. Each Board of Directors ensures that Aristocrat's Modern Slavery Statement is signed by a responsible Member of that Board.

Audit Commitee

The Audit Committee applies to the ALL Board only. The Committee, which has oversight of compliance with legal and regulatory (non-gaming) obligations, reviews the Group's joint Modern Slavery Statement and once approved by the Committee, recommends it to the ALL Board for approval.

Executive Steering Committee (ESC)

Our Executive Steering Commitee (**ESC**) is actively engaged with our anti-modern slavery compliance strategy, including developing and approving key enterprise-wide policies and procedures. The Group's anti-modern slavery program is owned by at least one member of the ESC to ensure that our modern slavery initiatives are implemented from the top and across the whole of our business.

Anti-Modern Slavery Working Group

The Anti-Modern Slavery Working Group has responsibility for the development and implementation of the Group's anti-modern slavery program. The Working Group is sponsored by the SVP of Global Strategic Sourcing and is comprised of members from the Global Strategic Sourcing and Legal teams. The Working Group has a Charter which governs its conduct and sets out the roles and responsibilities for the Group's anti-modern slavery program.

The objective of the Working Group (as per its Charter) is to effectively pursue initiatives combating modern slavery that both satisfy Aristocrat's legal obligations as well as help fulfill Aristocrat's corporate vision of being a responsible business and good citizen, including through ethical sourcing.

Anti-Modern Slavery Champions

These champions are the key points of contact between the individual business units within the Project Stakeholder Group and the Working Group on all matters relating to the anti-modern slavery program.

Project Stakeholder Group

The Project Stakeholder Group, which the Anti-Modern Slavery Working Group regularly collaborates with, is comprised of stakeholders from across the business and provides input, feedback and approvals to the Working Group regarding the Group's anti-modern slavery initiatives.

- Group Sustainability
- Risk & Audit
- Pixel United
- Gaming
- Legal (Internal & External)
- Compliance
- People & Culture
- Company Secretariat
- Tax & Finance
- Anaxi
- Learning & Development
- Health, Safety & Environ.
- Regional Teams
- Global Strategic Sourcing (incl. Indirect Sourcing)
- Communications

Good Business, Good Citizen.

A. APPROACH TO ASSESSING AND ADDRESSING RISKS

We continue to assess our business to identify key stakeholders (new and existing) whose participation and collaboration is integral to the Group's progress in this area. During the previous reporting period, the Working Group developed a Modern Slavery Stakeholder Engagement Strategy for 2022-2024 to address the needs of different Project Stakeholder Groups within Aristocrat depending on their awareness, engagement levels and possible impact on the success of initiatives. In this reporting period, the Working Group successfully moved several key Project Stakeholder Groups from a "neutral" engagement level (where engagement was primarily driven by the Working Group) to a "positive" engagement level (where stakeholders proactively reached out to the Working Group on modern slavery issues), which illustrates the increasing awareness of modern slavery risks within the business, and increases the likelihood of successful initiatives within those Project Stakeholder Groups.

In Financial Year 2022, to increase general awareness of modern slavery by all employees as part of its holistic communications strategy, the Working Group:

- created a dedicated internal intranet page for modern slavery resources and information about Aristocrat's anti-modern slavery program;
- hosted the inaugural Anti-Modern Slavery and ESG Summit for senior leaders within the business (see Section IV.D.(2)); and
- presented at various leadership meetings and town halls to highlight the work being done as part of Aristocrat's anti-modern slavery program.

In addition to the above activities, the Working Group continued to engage with staff on modern slavery issues via various channels, including regular communications, corporate newsletters, small group discussions, tailored presentations to key Project Stakeholder Groups, and global digital employee discussion platforms. Commencing in Financial Year 2022, we have also implemented a more targeted communications strategy for key stakeholder groups, including tailored regular meetings with different business teams to discuss modern slavery issues, and this strategy is intended to continue into Financial Year 2023 and beyond.

The Working Group continues to engage external legal experts in Australia and the UK to inform the Group's approach to modern slavery compliance. Further, the Working Group has benchmarked various aspects of the Group's program against competitors and other businesses as a way to continue its commitment to improvement in this space.



B. ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

1. Existing actions

The table below contains the actions that have been implemented by the Group in previous reporting periods, and which continue to be applicable now to assessing and addressing modern slavery risks in our operations and supply chains.

1. Policies, Procedures and other Documents

1.1 The Global Employee Handbook and Code of Conduct

Group employees are required to comply with the Aristocrat Group Global Employee Handbook and Code of Conduct, which:

- expressly confirms the Group's commitment to ethical sourcing and the prevention of worker exploitation, including the prohibition of modern slavery and human trafficking in its business and global supply chain;
- commits the Group to adhering to all applicable laws that relate to countering modern slavery and human trafficking;
- requires Group employees to refrain from inappropriate, insulting, intimidating, violent, abusive, demeaning or bullying conduct towards others; and
- requires the Group to take all reasonable precautions to provide workplaces that are safe and healthy, such as compliance with all health and safety procedures applicable at Aristocrat workplaces.

Employees are required to acknowledge all relevant policies, including the Global Employee Handbook and Code of Conduct, when they commence employment with Aristocrat.

1.2 Anti-Modern Slavery and Human Trafficking Policy

Group employees are subject to the Anti-Modern Slavery and Human Trafficking Policy (**Anti-Modern Slavery Policy**), which:

- explains the concepts of modern slavery and human trafficking in layperson's terms, without referring to specific legislative provisions;
- imposes a "zero tolerance" approach for modern slavery and human trafficking within the Group's business and supply chain;
- requires Group directors, officers and employees to report actual or suspected modern slavery and human trafficking to a dedicated email address monitored by key members of the Working Group; and
- identifies several potential indicators of modern slavery and human trafficking to which Group directors, officers and employees should be alert, including restricted freedoms, poor working conditions or accommodation, improper financial arrangements, suspicious behaviours and appearances, and geographic risk factors.

For further actions and updates in Financial Year 2022, see Section IV.C.

B. ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

1.3 Modern Slavery Incident Response Guide

The Modern Slavery Incident Response Guide (**Incident Response Guide**):

- assigns responsibility for coordinating the response to an actual or suspected modern slavery incident, and for notifying and consulting other relevant Group staff, taking a whole-of-Group approach and involving all stakeholders up to and including the Board; and
- includes guidance regarding the investigation and remediation of actual or suspected modern slavery incidents within the Group's operations and supply chain.

Our approach to remediation considers the privacy of potential victims and the importance of maintaining confidentiality, appropriateness and accessibility of remediation measures for potential victims and suppliers and, where possible (and subject to the privacy of potential victims), following up after a response or remediation plan has been implemented to ensure that the measures were effective and that no outstanding issues remain.

For further actions and updates in Financial Year 2022, see Section IV.H.

1.4 Supplier Code of Conduct

Our Supplier Code of Conduct articulates the Group's expectations for Key Direct Suppliers and Sub-Tier Suppliers and any other Gaming suppliers engaged via our Master Supply Agreements and purchase orders (including some Indirect Sourcing suppliers for Gaming) with respect to modern slavery and human trafficking, as well as several other labour, health and safety, and environmental standards. It:

- places obligations on our suppliers based on the Australian Modern Slavery Act, the UK Modern Slavery Act, the Responsible Business Alliance Code of Conduct and other international standards; and
- in several respects, requires suppliers to exceed minimum local legal standards, and to commit to using their best efforts to meet several aspirational standards (such as compliance with maximum working hours and industry standards relating to wages and benefits).

The obligation to comply with the Supplier Code of Conduct is imposed on Key Direct Suppliers and Sub-Tier Suppliers and other Gaming suppliers (as noted above) through ethical sourcing clauses in our Master Supply Agreements and purchase orders (see Item 3.4 below). Aristocrat will assess a supplier's performance and commitment to compliance when making sourcing decisions, including the selection, retention, and remediation of issues with suppliers. In most instances, our preference will be to support suppliers to improve their standards over a reasonable period, rather than terminate supplier relationships. At all times, our response to non-compliance will consider the best interests of workers who may be the victims of poor working conditions.

For further actions and updates in Financial Year 2022, see Section IV.F.

1.5 Guidance regarding supplier interactions on modern slavery issues

This guidance document provides best practice guidance to supplier-facing staff who attend supplier sites, on how to interact with suppliers if potential modern slavery issues are identified during an audit or site visit. The primary focus of the guidance document is to ensure that suspected modern slavery issues can be raised and addressed promptly and safely with suppliers in a manner that keeps potential victims of modern slavery safe from harm. The plan is for this document to be provided to appropriate staff members, together with an education session, before they undertake any site visit or audit.

B. ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

2. Supplier Due Diligence

2.1 Supplier self-assessment

The Global Strategic Sourcing (**GSS**) team (which sits within our broader Global Supply Chain team) conducts supplier due diligence in a risk-based manner for Key Direct Suppliers and Sub-Tier Suppliers. This supplier due diligence assessment takes the form of a supplier self-assessment and covers a range of topics including:

- supplier capability and production capacity;
- quality;
- ESG issues;
- workplace health and safety;
- financial health (completed by a third party); and
- modern slavery and human trafficking,

and also includes suppliers' verification of compliance with Aristocrat's standard sourcing policies. The GSS team is also governed by the Group's Supplier Due Diligence Procedure which targets Key Direct Suppliers and Sub-Tier Suppliers and encourages regular due diligence assessments of these suppliers, which Aristocrat Gaming aims to undertake every 24 months.

2.2 Modern Slavery Supplier Survey

The Modern Slavery Supplier Survey (**Supplier Survey**) requires Key Direct Suppliers and Sub-Tier Suppliers to respond to more than 80 detailed questions specifically addressing modern slavery issues, to allow Aristocrat to understand how each supplier manages and responds to each of the below topics:

- nature of goods and services;
- nature of workforce;
- specific labour risks; and
- risk identification and mitigation.

The Supplier Survey also addresses the risks concerning the use of Uyghur forced labour in Xinjiang and other regions of China. Once responses are received from the supplier, they are critically reviewed for completeness. Clarifications are sought for responses that are incomplete, vague or unclear. Evidence to support supplier policies and processes related to modern slavery compliance (as well as copies of the policies and processes themselves) are requested for verification in all cases. For example, validations are requested for employee age and working rights, including any contracted labour through employment agencies. The GSS team aims to conduct the Supplier Survey every 24 months, along with other supplier due diligence.

For further actions and updates in Financial Year 2022, see Section IV.I.(2)(a).

2.3 Supplier visits and audits

Aristocrat's Global Supply Chain management team conducts periodic supplier visits and audits to monitor Key Direct Suppliers and Sub-Tier Suppliers. The purpose of the supplier visits is to monitor matters identified in the supplier due diligence assessment, the Modern Slavery Supplier Survey and the Supplier Business Reviews (**SBRs**) as discussed further below. Such audits are conducted in a risk-based manner, with a focus on the Key Direct Suppliers and Sub-Tier Suppliers that account for most of the Group's direct spend.

The GSS team has included a section specific to modern slavery in our SBRs. These reviews are conducted with Key Direct Suppliers and Sub-Tier Suppliers in accordance with our internal SBR Procedure. The purpose of the SBRs is to provide a forum for Aristocrat and the key strategic suppliers to discuss and share information on business performance, trends, issues, risks, initiatives and other topics as directed by either party.

For further actions and updates in Financial Year 2022, see Section IV.I.(2)(c).



3. Other Actions

3.1 General Training

Aristocrat has implemented general modern slavery prevention training for all Aristocrat Gaming employees globally and the ALL and ATEL Boards. This training is also included as part of mandatory training for all newly onboarded Gaming employees.

For further actions and updates in Financial Year 2022, see Section IV.D.(1).

3.2 Employee reporting service and grievance mechanism

Employees can report actual or suspected modern slavery incidents:

- to a dedicated email address monitored by key members of the Working Group. This email address is communicated to employees in the Anti-Modern Slavery Policy and the Modern Slavery Incident Response Guide, as well as via the modern slavery training and Anti-Modern Slavery intranet page; and
- through Aristocrat's Whistleblower Program, which can be accessed either through the dedicated hotline or web intake site, both of which are available 24 hours a day, 365 days a year. This confidential, independent communication service is provided by a third-party ethics and compliance specialist. Reports can also be made directly to senior management, including ESC members, managing directors of business units and members of the Group Risk & Audit team. The Whistleblower Program is communicated to employees through the Global Employee Handbook and Code of Conduct and mandatory Compliance Certification training. All details of the Whistleblower Program, including relevant contact information, are made readily available to employees on Aristocrat's intranet.

For further actions and updates in Financial Year 2022, see Section IV.E.

3.3 Compliance probity checks

As part of our standard compliance procedures and onboarding process, a probity investigation is required for all new and current suppliers that Aristocrat expects to spend above AU$ or US$1 million in any calendar year. A specific check relating to modern slavery has been added to the probity investigation process which is coordinated by our Compliance team. This check uses publicly available information to identify any material litigation, enforcement action or adverse media reports relating to modern slavery issues that the supplier may have been involved in.

3.4 Contractual ethical sourcing clauses

All template Master Supply Agreements for our Key Direct Suppliers and Sub-Tier Suppliers, as well as global purchase order terms and conditions (which are utilised globally for a wide variety of day-to-day transactions by the business), have been updated to include ethical sourcing clauses, which require suppliers to comply with all applicable modern slavery, human rights, conflict minerals and related laws. For existing Master Supply Agreements with Key Direct Suppliers and Sub-Tier Suppliers, a new agreement or a variation to the existing agreement was signed to include the ethical sourcing clauses.

For further actions and updates in Financial Year 2022, see Section IV.J.

B. ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

2. Updates in Financial Year 2022

Further actions taken in Financial Year 2022 (either new actions or extensions of existing actions), as well as planned actions for Financial Year 2023 and beyond, are discussed in detail in Sections C to K below.

C. POLICIES

In Financial Year 2022, a standalone Anti-Modern Slavery and Human Trafficking Policy was rolled out for the Pixel United business, following extensive consultation with all the Pixel United businesses and leadership teams to adjust and align this policy with the operations and expectations of those businesses. Both the existing Anti-Modern Slavery Policy (see Item 1.2 in Section IV.B.(1)) and the Pixel United Anti-Modern Slavery and Human Trafficking Policy (together, the **Anti-Modern Slavery Policies**) will be reviewed at regular intervals. These reviews will include an assessment and evaluation of their effectiveness, as well as any procedures or practices relating to their implementation. More frequent reviews may be conducted if merited by changes in legal or regulatory requirements, or emerging best practices for ethical sourcing.

Additionally, to enhance accessibility to the Anti-Modern Slavery Policies, in Financial Year 2023 we are planning to translate the Anti-Modern Slavery Policies so that they are accessible in our workers' languages. Work has already commenced in this space, with Plarium providing Hebrew and Ukrainian translations of the Pixel United Anti-Modern Slavery and Human Trafficking Policy to its employees.

We also commenced our review of Group policies more broadly, to ensure that modern slavery risk management is considered in broader aspects of the organisation. As part of this process, in this reporting period we worked with the Indirect Sourcing team to include modern slavery language in the Indirect Sourcing Policy, which was published in early 2022. This policy references modern slavery as a key consideration in responsible and ethical sourcing and also includes a link to the Group's Anti-Modern Slavery and Human Trafficking Policy. The policy review process will continue in Financial Year 2023 and beyond, in consultation with relevant stakeholders within the business and in alignment with the Group's policy review procedures.



The shows actions that have been newly implemented in Financial Year 2022

D. TRAINING AND RAISING AWARENESS

1. Training

In addition to the general modern slavery prevention training implemented for Aristocrat Gaming (see Item 3.1 in Section IV.B.(1)), tailored modern slavery prevention training was rolled out for all Pixel United staff in early 2022.

Our Statement last year indicated that we were in the process of creating further tailored training for specific groups within the business that might have greater exposure to modern slavery risks in their day-to-day activities. During 2022, we can report that:

1. We have now also rolled out **supplementary modern slavery training for supplier-facing staff**, to raise awareness around the specific modern slavery risks that these staff members may encounter in their day-to-day activities, including in relation to in-person supplier interactions (such as audits). The training is designed to provide this category of staff with tailored examples of issues that they could encounter during supplier site visits together with ways to effectively address those issues.

2. **Supplementary training for key People & Culture staff** continues to be developed and is expected to be rolled out in 2023 (with the slight delay in roll-out being due to competing priorities within our roadmap activities). Similar to the above, this training module is designed to provide tailored examples to staff in our People & Culture teams to further raise awareness and enable them to effectively address those issues in their day-to-day activities.

3. Going forward, we will also continue to consider if any additional supplementary training may be required for any other groups or business functions that may have greater exposure to modern slavery risks.



D. TRAINING AND RAISING AWARENESS

2. Raising awareness

To further raise awareness about modern slavery and the associated risks within the Aristocrat business, in early August 2022 the Working Group hosted an inaugural Anti-Modern Slavery and ESG Summit (**Summit**) for senior Aristocrat leaders from across the globe, including the Group CEO, CEO of Aristocrat Gaming, CEO of Online RMG and four members of the ESC. The purpose of the Summit was to raise awareness around modern slavery, highlight the action we need to take as a business to address modern slavery risks, and lay the foundation for ongoing engagement in this space.



The two-day program featured:

- external guest speakers from:
    1. our external legal partners (who spoke about the legal foundation for our work in this space);
    2. the Freedom Hub (who are discussed in more detail below, and who spoke about the human impact of this issue globally); and
    3. two of our key gaming component suppliers (who shared their ESG and modern slavery journeys);
- a multi-disciplinary panel discussion, which included panellists from Aristocrat's leadership team, which highlighted different perspectives on modern slavery, including Legal, People & Culture, Global Supply Chain and Sustainability; and
- a presentation from the Working Group on our two-year Anti-Modern Slavery Strategy and Roadmap.

As part of the Summit, Aristocrat engaged with the Freedom Hub, an Australian charitable organisation that is working to end slavery in Australia, rehabilitate survivors of this crime and partner in the fight to end global slavery. The Group will continue to explore future opportunities for engagement and collaboration with the Freedom Hub and other organisations that are working to end modern slavery.

The inaugural Summit was well-received and attendees provided positive feedback on its impact, including raised awareness of modern slavery issues and fostering ongoing engagement. The Working Group plans to host future Summits to continue the ongoing engagement.

E. EMPLOYEE REPORTING SERVICE AND GRIEVANCE MECHANISM

Aristocrat continues to recognise the importance of having trusted and accessible reporting and grievance mechanisms as a way for people to safely raise concerns. As at this Statement's publication date, Aristocrat has not received any reports of critical modern slavery incidents through our various reporting channels that: (a) present a risk to the life, physical or mental wellbeing, or freedom of workers; or (b) involve a material breach of mandatory requirements under applicable laws or regulations. However, we continue to be encouraged by the fact that, with the continued implementation of training and other awareness-raising initiatives, we are seeing more queries relating to modern slavery risks, as well as some reports of potential modern slavery incidents that were investigated and resolved without any critical issues being identified.

Aristocrat continues to maintain confidential reporting services that provide a channel for employees to report potential misconduct anonymously and confidentially, including breaches of Group policies and procedures, discriminatory treatment, harassment and bullying, workplace safety standards, and other types of improper behaviour. Where possible, and subject to the confidentiality of reports and the privacy of the individuals making them, the Working Group will follow up after a reported incident or query is investigated and resolved to ensure that no outstanding issues remain. For further information on our existing reporting mechanisms, see Item 3.2 in Section IV.B.(1).

As our anti-modern slavery program continues to evolve, we are also exploring ways in which we can not only enhance our modern slavery reporting mechanisms, but also work with our suppliers to enhance their own reporting mechanisms, to align with best practice. This work will continue in Financial Year 2023 and beyond.

F. SUPPLIER CODE OF CONDUCT

Our Supplier Code of Conduct articulates the Group's expectations for Key Direct Suppliers and Sub-Tier Suppliers and any other Gaming suppliers engaged via our purchase orders (including some Indirect Sourcing suppliers for Gaming) with respect to modern slavery and human trafficking, as well as several other labour, health and safety, and environmental standards. For further information, see Item 1.4 in Section IV.B.(1).

As indicated in our last Statement, a review of our Supplier Code of Conduct was completed early in Financial Year 2022 in collaboration with Legal, Health, Safety and Environment, and other business functions. Enhancements were made to further emphasise the importance of our suppliers managing modern slavery risks in their supply chains including the expectation to pass-through obligations to their sub-tier suppliers where practical. The updated Supplier Code of Conduct was published in early 2022. In Financial Year 2023, we plan to assess how the Supplier Code of Conduct can also be extended to other suppliers, such as Pixel United suppliers.

In terms of validating suppliers' responses to the requirements of the Supplier Code of Conduct, as supplier visits did not resume until later in Financial Year 2022 following the easing of travel restrictions due to COVID-19, Aristocrat has now conducted two supplier visits in this reporting period (discussed further in Section IV.I.(2)(c)) and intends to continue its efforts to visit other supplier premises and validate responses in Financial Year 2023 and beyond.

G. COMPLIANCE CHECKS

In addition to the compliance probity checks (see Item 3.3 in Section IV.B.(1)), in Financial Year 2022, we have extended an existing compliance self-certification to include specific modern slavery questions. This half-yearly self-certification is a questionnaire required to be completed by senior managers globally within the Group, which contains a set of questions on key matters to ensure we operate appropriately, safely, and in compliance with regulations and policies. The responses to the last self-certification did not reveal any actual or potential modern slavery issues or incidents.

H. MODERN SLAVERY INCIDENT RESPONSE GUIDE

The Group's Approach to Remediation

The Group's approach to remediation of modern slavery risks is based on four key principles, which reflect best practice guidance issued by the Australian Government, the UK Government and non-governmental organisations:

- remediation actions should consider the best interests of actual or suspected victims – this includes recognition that immediate termination of our relationships with suppliers that are alleged to have engaged in violations of our standards may not be the most appropriate course of action, and could expose victims to greater risk;
- remediation actions should be designed to prevent ongoing harm, and to provide redress for past harm;
- wherever possible, remediation actions should be collaborative and will be most effective when they are developed in collaboration with our suppliers; and
- where lessons can be learned from specific incidents, we seek to share best practices within our own operations and, where appropriate, implement any improvements within our supply chain.

The Group's Modern Slavery Incident Response Guide (see Item 1.3 in Section IV.B.(1)) is intended to be published in Financial Year 2023, and the Group intends to integrate it with the Group's overarching incident response and business resilience framework through further communications and training with the relevant business functions. The Group had planned to conduct a modern slavery incident simulation in 2022, which has now been moved to 2023 due to competing priorities within the anti-modern slavery program, and which is intended to further educate and prepare the Group for a response that is consistent with the remediation principles in the Incident Response Guide. Nevertheless, in considering and responding to queries received regarding modern slavery risks (see Section IV.E), the Working Group has already had regard to the incident response procedures and requirements in the Incident Response Guide as a way to 'test' these procedures on a preliminary basis.



CASE STUDY

Potential modern slavery incidents and queries that are received through Aristocrat's dedicated modern slavery inbox have also been utilised by the Working Group during this reporting period to refine and test the effectiveness of Aristocrat's Incident Response Guide. For example, a specific enquiry received in this reporting period, was treated by the Working Group in accordance with the procedures in our Incident Response Guide, and investigations were carried out, including consultation with external legal counsel, within the specified two-week period for critical incidents despite the incident not being classified as critical. Ultimately, the enquiry was found not to give rise to any modern slavery issues, and this outcome was communicated to the appropriate concerned parties to finalise the enquiry process.

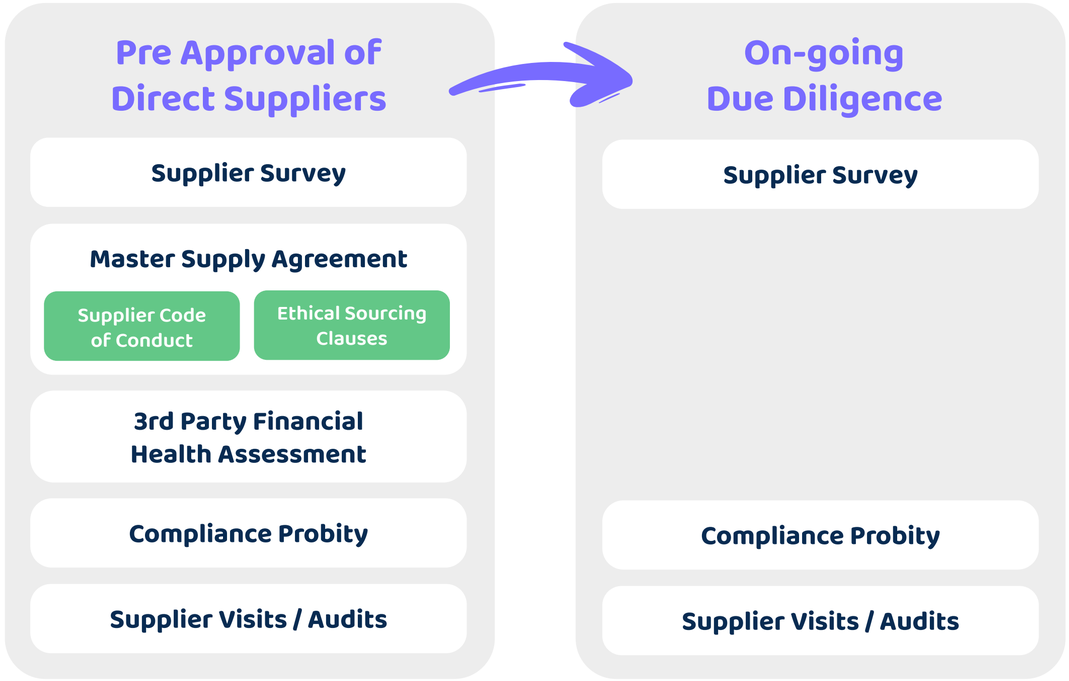
I. SUPPLIER ENGAGEMENT AND DUE DILIGENCE

1. Process for Key Direct Suppliers and Sub-Tier Suppliers

This is an example of how Aristocrat has applied supplier engagement and due diligence processes in relation to a category of its suppliers who are considered to carry a higher risk from a modern slavery perspective, namely our Key Direct Suppliers and Sub-Tier Suppliers (see Section II.B.(1)), and which are therefore subject to a stringent process.

The supplier due diligence steps portrayed in the image below apply to all new and existing Key Direct Suppliers and Sub-Tier Suppliers engaged by GSS. It is composed of two key steps:

- pre-approval process – only after this process is completed are suppliers given the opportunity to bid on potential supplies for Aristocrat. The responses provided by the suppliers as part of this process (through surveys, assessments and audits) are critically reviewed and checked for completeness by Aristocrat; and
- ongoing due diligence – ongoing checks are conducted after the pre-approval process is completed to ensure that suppliers retain the ability to supply products to Aristocrat. The due diligence process takes place every 24 months at a minimum, as required by policy, with the exception of probity checks which are undertaken every 36 months at a minimum, as defined by Compliance policy.



2. Measures for supplier due diligence

The measures set out in Sections IV.I.(2)(a) to (2)(d) below apply to Key Direct Suppliers and Sub-Tier Suppliers, and may also apply to other suppliers (such as Indirect Sourcing and Pixel United suppliers) where indicated below.

a. Supplier Survey

The Supplier Survey has been used as a tool not only to identify risks within our supply chain, but also to understand those risks and how best to mitigate them (see Item 2.2 in Section IV.B.(1)).

As noted in the previous reporting period, Aristocrat Gaming issued the Supplier Survey to all the 49 Key Direct Suppliers and Sub-Tier Suppliers of gaming components in 2020 and 2021 in a prioritised manner based on risk and criticality. In Financial Year 2022, an additional tranche of the Supplier Survey was released to include VGT suppliers that had not already been included in any of the earlier tranches.

We also worked with the Pixel United businesses to develop a supplier survey for their key suppliers. This supplier survey is based on the Supplier Survey used for Gaming suppliers, but has been tailored to take into account the specific risk profile of the Pixel United business and suppliers. The Pixel United supplier survey is expected to be released to an initial tranche of key suppliers in Financial Year 2023 to test the efficacy of the survey, with further tranches to follow thereafter.

As our anti-modern slavery program develops, we continue to evolve the questions that we ask of our current and future suppliers. As such, we have a database of questions related to modern slavery risk, and depending on the level of risk and influence of our company, we tailor the questions to the particular due diligence process (such as Requests for Proposals (**RFP**), M&A due diligence, and risk assessments). The mapping processes discussed in Section II.B.(1)(c) will also help us to identify sub-suppliers in tiers beyond our Key Direct Suppliers and Sub-Tier Suppliers, so that we can consider the potential application of the Supplier Survey and other due diligence measures to these sub-suppliers.

b. Other supplier due diligence

In Financial Year 2022, the following actions were taken to implement modern slavery questions in supplier selection and due diligence processes for Indirect Sourcing within Aristocrat Gaming to enhance the Group's ability to identify, assess and remediate the risks of modern slavery in our Indirect Sourcing:

- specific modern slavery questions were added to the RFP template, which all respondents to an RFP will be required to complete. The implementation of these questions is also planned to be incorporated into the RFP processes of other groups in Financial Year 2023 and beyond, including for pre-approval for any new Gaming suppliers intended to become Key Direct Suppliers and Sub-Tier Suppliers; and
- as part of the work being done to enhance and centralise our Indirect Sourcing systems, a vendor onboarding process is being developed, which will also include modern slavery questions. The development of this vendor onboarding process, including the modern slavery questions, will continue in Financial Year 2023.

Further work is planned for future reporting periods to assess whether the above measures can also be tailored for Pixel United.

c. Supplier visits and audits

Prior to the COVID-19 pandemic, Aristocrat's GSS management team conducted periodic on-site supplier visits and audits to monitor Key Direct Suppliers and Sub-Tier Suppliers. The ongoing pandemic and related travel restrictions prevented the supplier audit visits since March 2020. However, in early 2022, we were able to resume our on-site supplier audits with the easing of internal restrictions on travel that were in place to protect staff during the pandemic (in line with our 'People First' approach).

In 2022, the GSS senior leadership team visited key critical suppliers in Korea. Korea was chosen given it was the first country where critical suppliers are located and where COVID-19 travel restrictions were eased. The purpose of the travel was to reengage with Key Direct Suppliers and Sub-Tier Suppliers after 3 years without face-to-face visits.

Additional education was provided to the relevant Aristocrat team by providing them with a summary of key country-specific employment standards to assist the GSS team with identifying any potential modern slavery issues. In addition, the Working Group took the opportunity to have Aristocrat's senior leadership present to suppliers an overview of Aristocrat's anti-modern slavery approach and to request further feedback from our suppliers specifically related to potential modern slavery risks and compliance with Aristocrat's Supplier Code of Conduct. The Working Group reviewed the responses from these suppliers and no modern slavery issues were identified. Going forward, as COVID-19 travel restrictions ease and travel continues to resume, the Working Group plans to engage with more of our Key Direct Suppliers and Sub-Tier Suppliers to audit their supply chain for modern slavery risks and validate compliance with the Supplier Code of Conduct.

d. Supplier education

As part of our collaboration with Key Direct Suppliers and Sub-Tier Suppliers, a presentation has been developed to share with our suppliers when on-site visits occur. The purpose of the presentation is to:

- raise awareness of the potential for modern slavery risk across all levels of Aristocrat's supply chain;
- communicate how to engage with Aristocrat to prevent potential modern slavery risks; and
- collaborate with suppliers on how to share best practices for preventing modern slavery risks.

We have also started engaging with our distributors through education sessions on Aristocrat's approach to addressing modern slavery risks, and we expect this engagement to continue in future reporting periods.

J. CONTRACTUAL MEASURES

1. Ethical sourcing provisions for suppliers

In Financial Year 2022, we continued our work to update our other agreements (for Aristocrat Gaming and Pixel United) in a risk-based manner, to further incorporate our ethical sourcing clauses (see Item 3.4 in Section IV.B.(1)). This included consideration of agreements for higher risk products and services, including the categories noted in Section III.B.(2) as part of developing general guidance on implementation of our ethical sourcing clauses. This guidance is expected to be rolled out globally in Financial Year 2023, following which we expect further collaboration with the respective legal teams and businesses to ensure that the clauses suit the businesses and types of agreements in question.



2. Staffing agreements

In addition to our ethical sourcing clauses, we continued our work to implement specific modern slavery clauses in the Group's staffing agreements, in order to address the modern slavery risks associated with engagement of contractors and temporary workers. For Aristocrat Gaming, all our key staffing agreement templates for contingent workers have been updated to require third-party recruitment/labour hire agencies to (a) pay wages without deduction (except as required by law), and (b) give Aristocrat access to the agency's records to enable Aristocrat to verify that workers are being paid accordingly. We have also commenced implementation of clauses (a) prohibiting third-party agencies from charging recruitment fees and confiscating identification documents of their workers, and (b) requiring third-party agencies to have appropriate grievance mechanisms in place where workers can report potential modern slavery incidents and other employment-related grievances, to further mitigate potential modern slavery risks. These clauses will continue to be implemented in a risk-based manner in Financial Year 2023 and beyond.

These contractual amendments are also intended to be applied in the Group's other staffing and similar agreements, including Pixel United agreements, as appropriate, and will form part of the general guidance to be rolled out in Financial Year 2023 (as discussed above).

We intend to continue to refine our ethical sourcing and modern slavery clauses by reference to industry standards, government guidance, and by continually reviewing developments in this space. Additionally, our clauses allow us to conduct audits to verify compliance, and we will consider ways to audit and verify supplier compliance in future reporting periods.

K. OTHER ACTIONS



In Financial Year 2022, the Working Group worked with the M&A team to develop and implement specific modern slavery questions to be included as part of the preliminary due diligence and detailed due diligence in the M&A process. The questions were tailored to each stage of the process, with the detailed due diligence questions being more in-depth and extensive, and covering areas such as the nature of the goods and/or services provided by the target company, nature of the target company's workforce, specific labour risks, modern slavery obligations, and risk identification and mitigation. For consistency with our supplier due diligence, questions were also aligned with the Supplier Survey (see Item 2.2 in Section IV.B.(1)) and adapted as required.

For the acquisition of Roxor (see Section I.B.), modern slavery was an area of due diligence. Modern slavery considerations will continue to be embedded in both M&A and other enterprise-level processes.

V. Assessing the effectiveness of our actions to assess and address modern slavery risks

Consistent with previous reporting periods, in Financial Year 2022, the Working Group (in consultation with a variety of relevant stakeholders as set out in Section IV.A) has assessed the effectiveness of Aristocrat's approach to mitigating modern slavery and human trafficking risks based on the key performance indicators (**KPIs**) below, which were first set out in 2019 and tied to specific objectives for the early years of the modern slavery compliance program. The effectiveness of our actions is assessed against the KPIs on an annual basis.

In addition to our own internal assessments, we rely on a range of independent assessments (such as reports from independent third parties like universities and other bodies that assess the quality of disclosures), as well as our external legal support, to assess the effectiveness and quality of our approach to mitigating modern slavery and human trafficking risks. For example, in 2022, we considered a report published by Monash University, as referenced in Section VII.A below.

Modern Slavery KPIs

Key objective	Key performance indicator	Summary of performance up to and including Financial Year 2022
Employee training and awareness. *Although Aristocrat has a longstanding sustainability and supply chain compliance program, the Group did not have a lengthy track record of dealing with modern slavery issues specifically. Accordingly, the effectiveness of our program depended on raising awareness of the key concepts of modern slavery and human trafficking.*	The percentage of Group employees, including those in supplier-facing roles, who have received training regarding the Anti-Modern Slavery Policy.	• Approximately 5,100 employees (**95.5%** of all **Aristocrat Gaming** employees and **80%** of all **Pixel United** employees (excluding Plarium)) have completed the company's general modern slavery training and assessment questionnaire. • **100%** of ALL and ATEL **Board members** have completed the company's general modern slavery training and assessment questionnaire. • Within Aristocrat Gaming, **100%** of **supplier-facing staff** have completed the general modern slavery training. • New Aristocrat Gaming and Pixel United employees are required to complete the general modern slavery training within 90 days of commencing employment. • Qualitative feedback has been obtained from employees in relation to training provided (see next page).
Consistent application of the Supplier Code of Conduct and the ethical sourcing contractual safeguards. *Aristocrat's suppliers were in the past not subject to any specific ethical sourcing obligations, so the introduction of new contractual provisions served three purposes:* *1) raising awareness of modern slavery and human trafficking among Suppliers;* *2) setting the Group's expectations regarding these issues; and* *3) providing mechanisms for the Group to monitor suppliers and address any concerns regarding standards violations.*	The percentage of the Group's Key Direct Suppliers and Sub-Tier Suppliers that are signatories to the ethical sourcing contractual safeguards or otherwise subject to the Supplier Code of Conduct.	• **Approximately 97%** of our contracted Key Direct Suppliers and Sub-Tier Suppliers have **incorporated ethical sourcing clauses** in their Master Supply Agreements and have agreed to comply with the Supplier Code of Conduct. We are also working with VGT to add ethical sourcing clauses to their key supplier agreements where required, and this work will continue in Financial Year 2023. • As part of our due diligence process (see Section IV.I), we are continually and actively communicating with Key Direct Suppliers and Sub-Tier Suppliers regarding our requirements and monitoring their compliance with our agreements. • Key Direct Suppliers and Sub-Tier Suppliers are provided with an electronic copy of the Group's Supplier Code of Conduct upon signing an agreement with Aristocrat.

[1]While training completion figures for Plarium staff are unavailable due to system differences, general modern slavery training has been distributed to all 1,370 Plarium employees (approximately), and is also included in the onboarding package for all new Plarium employees as a mandatory requirement.

Key objective	Key performance indicator	Summary of performance up to and including Financial Year 2022
		• A hyperlink to the Supplier Code of Conduct is also included in our purchase order terms and conditions (as discussed in Item 1.4 of Section IV.B.(1) and Section IV.F). Updates to the agreement templates in the previous reporting period included obligations for suppliers to comply with the Supplier Code of Conduct (more details on the Supplier Code of Conduct are in Item 1.4 of Section IV.B.(1) and Section IV.F). • Additionally, for Aristocrat Gaming, all our key staffing agreement templates for contingent workers have been updated to include specific clauses addressing modern slavery risks (see Section IV.J.(2)). • Progress in this space in relation to the Pixel United business is continuing, as discussed in Section IV.J.
Prompt remediation of critical incidents. *For this purpose, critical incidents are defined to include incidents involving our operations or our direct suppliers that:* 1. *present a risk to the life, physical or mental wellbeing, or freedom of workers; or* 2. *involve a material breach of mandatory requirements under applicable laws or regulations.*	The percentage of the Group's Key Direct Suppliers and Sub-Tier Suppliers with one or more critical issues incidents during the financial year, that remediated their respective critical issues incidents within two weeks or less.	• As noted in Sections III and IV.E, the Group **did not identify any specific incidents** of modern slavery in our operations or supply chain in Financial Year 2022, including no critical issues. • As discussed in Section IV.E, the Group has received queries and reports relating to potential modern slavery issues, with an increase in such queries from the previous reporting period. For further information on our incident response procedures, see Item 1.3 of Section IV.B.(1) and Section IV.H.

As well as the quantitative assessment of its performance against the KPIs listed above, Aristocrat has also sought qualitative feedback on the effectiveness of its modern slavery training.

The following feedback was received from a senior leader in Pixel United:

> I appreciated that Pixel United received tailored modern slavery prevention training that was easy to understand and apply. It took into consideration our digital business' risk profile and brought awareness to how we can identify and report potential modern slavery risks.

For Financial Year 2022, one objective was to increase knowledge fluency among employees with direct responsibility for dealing with modern slavery issues, through further training and education. The first step in increasing knowledge fluency has been our inaugural Summit (see Section IV.D.(2)). We received the following feedback from one of the senior leaders who attended the Summit, which speaks to the qualitative assessment of our anti-modern slavery efforts:

> Our awareness and understanding of the increasing risks of modern slavery have been heightened by participating in the inaugural Anti-Modern Slavery and ESG Summit and also the separate Regional Leadership Team engagement this year. We look forward to continuing to advance our efforts and adapt our approach.
>
> **Senior Leader, APAC Region**

Another way we are increasing knowledge fluency is through the delivery of supplementary training to our supplier-facing employees, which has been released early in Financial Year 2023. Our next step will be to evaluate the effectiveness of the training and to allocate supplemental training to specific People & Culture employees who are responsible for recruitment and labour hire.



Aristocrat continues to periodically review the KPIs listed above to determine whether they continue to represent appropriate criteria for measuring the effectiveness of Aristocrat's efforts to mitigate modern slavery and human trafficking risks. For Financial Year 2023, Aristocrat is proposing to add an additional KPI relating to supplier audits to build on the considerable work that has been undertaken in relation to supplier surveys, as set out in Item 2.2 of Section IV.B.(1) and Section IV.I.(2). Our goal is to audit five of our 49 Key Direct Suppliers and Sub-Tier Suppliers in Financial Year 2023, subject to any remaining travel restrictions due to COVID-19 or geopolitical issues.

VI. Consultation

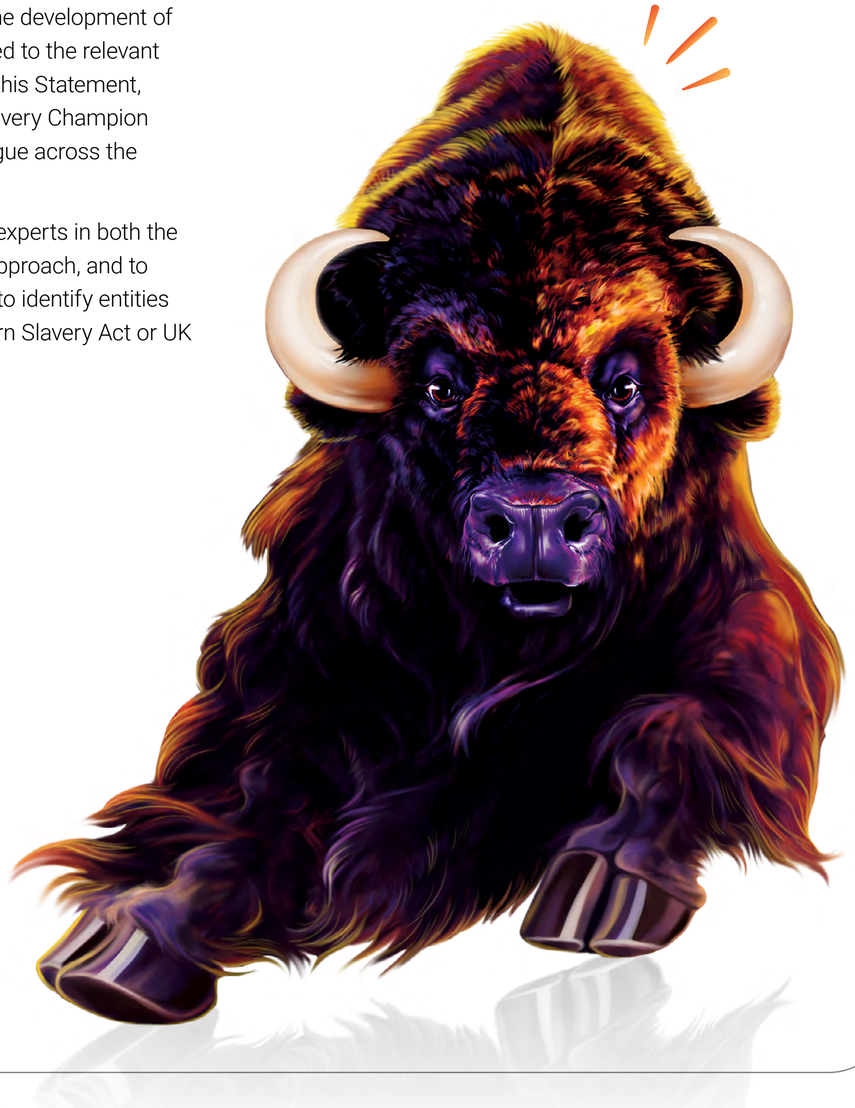
In accordance with the Australian Modern Slavery Act and relevant government guidance on consultation, we developed this joint Modern Slavery Statement in consultation with each of the Aristocrat Australian Reporting Entities and all entities which are owned or controlled by those Aristocrat Australian Reporting Entities.

The consultation process involved initial threshold assessments to determine which entities have reporting obligations under the Australian Modern Slavery Act or the UK Modern Slavery Act, consideration of how modern slavery risks vary across the Group, implementation of a Groupwide risk assessment process which is being rolled out as outlined in Sections III and IV, and ongoing agreement on our future roadmap for the next reporting period as further described in Section VII.D.

Aristocrat also separately consulted with the wider Group. This included tailored communication with Pixel United, recognising that the risk profile of Pixel United is likely to be different to the risk profile of other Aristocrat Gaming business segments. Our stakeholder engagement process is discussed in further detail in Section IV.A.

To ensure a robust consultation across the Group, members of the Project Stakeholder Group are also required to provide input into the development of the Statement and sign-off before the Statement is provided to the relevant Boards for final approval and signing. For the purposes of this Statement, we also leveraged our newly implemented Anti-Modern Slavery Champion network (see Section IV.A) to ensure full and effective dialogue across the Group.

Our Working Group has worked with modern slavery legal experts in both the UK and Australia, which helped to develop and refine our approach, and to ensure that we conducted an initial threshold assessment to identify entities that have a reporting obligation under the Australian Modern Slavery Act or UK Modern Slavery Act.



VII. Other important information

A. ENGAGEMENT, COLLABORATION AND STATEMENT ENHANCEMENTS

In Financial Year 2022, in addition to our Group consultation process, Aristocrat has taken further steps to engage with suppliers and other companies, to inform and further enhance our approach to modern slavery compliance, in accordance with the framework for third-party engagement which we developed in the previous reporting period.

We have considered the report from Monash University, published in October 2022, regarding the disclosure quality of 2021 modern slavery statements from ASX100 companies,[4] to identify ways to enhance our modern slavery statements. Based on the recommendations from this report, this Statement includes several enhancements compared to prior years, including:

- additional detail about our supply chains beyond Tier 1;
- additional detail about supplier audits and a specific KPI related to supplier audits;
- additional information about privacy and confidentiality, accessibility and follow-up in relation to reporting and remediation;
- additional detail about our ongoing consultation across Aristocrat's entities including our policy formulation and governance framework; and
- additional and thorough detail about both the actions we continue to take and the new actions we took in this reporting period to manage the risks of modern slavery practices in our operations.

As discussed in Section IV.D.(2), we collaborated with the Freedom Hub for our inaugural Summit, and we are continuing to explore opportunities for further collaboration. The Summit also gave us the opportunity to engage with two of our Key Gaming Suppliers and Sub-Tier Suppliers on their modern slavery and ESG programs.

We also connected with a data management provider to better understand how we could leverage technology to identify, assess and mitigate modern slavery risks in our business, as well as a prominent Australian company that is a leader in modern slavery risk management, in a further effort to collaborate and enhance the Group's future initiatives and leverage learning from other companies that are subject to the same reporting regime and leading the way in this space.

We look forward to further engagement and collaboration, including with our suppliers, to enhance our visibility of what our peers are doing to address modern slavery issues, keep up to date with 'best practice' as it continues to evolve, and identify opportunities for improvement in our own practices and initiatives.

[4]Pham, N., Cui, B., & Ruthbah, U. (2022) Modern Slavery Disclosure Quality Ratings: ASX100 Companies Update 2022 [Research brief]. Monash Centre for Financial Studies, Monash Business School. DOI: 10.26180/20224614.

B. GOVERNMENT RESOURCES AND KEY DEVELOPMENTS

Aristocrat welcomes guidance issued by the Australian and UK Governments in respect of compliance with the Australian Modern Slavery Act and the UK Modern Slavery Act, respectively. We have used this guidance, where appropriate, to help draft this Statement and inform our approach. The Group regularly reviews changes and developments in modern slavery and human trafficking laws and relevant guidance issued by governments and others.

We acknowledge that the Australian and UK Modern Slavery Acts are currently under active review, and we are monitoring these reviews for key changes. We also acknowledge the introduction of the NSW Modern Slavery Act. While this Act does not apply to Aristocrat, we are aware of the resources published by the NSW Anti-Slavery Commissioner, and we regularly review them to inform our approach.

We also regularly monitor developments in modern slavery laws globally, including the Canadian Bill S-211 to enact the 'Fighting Against Forced Labour and Child Labour in Supply Chains Act', which is currently being considered by the Canadian parliament. As Aristocrat has Gaming operations in Canada, we are closely monitoring the progress of this proposed legislation.



C. RELEVANT MATTERS IMPACTING OUR BUSINESS

1. Ukraine conflict

Prior to the conflict, approximately 1,000 people working for business units within Pixel United were located in Ukraine. Specifically, the business has offices in Lviv, Kyiv and Kharkiv, with further employees working in remote locations across the country. As noted in Section III.A.(1), Aristocrat has taken steps to assist Ukraine-based employees and their families to voluntarily relocate, either internationally or to safer locations within Ukraine. For further details on the actions taken to support employees and our crisis relief efforts, please see Section III.A.(1).

To provide a permanent base for those who have relocated overseas, and to expand and further diversify the company's development capabilities in global game talent hubs, four new studios have been opened across Poland, Spain and Canada. Where possible, supplier relationships in Ukraine have continued. Having taken steps to close its studio in Krasnodar, Russia, and suspend all supplier relationships in this country, Aristocrat has no ongoing presence in or exposure to the Russian market. Supplier relationships in Belarus have also come under review, with many of these relationships already having been suspended or terminated due to the conflict.

While the situation remains dynamic, the business has implemented an effective continuity plan enabling it to manage the disruption and continue to operate by delivering digital gaming content, as well as live operations and features across the portfolio.

2. COVID-19 pandemic

The ongoing COVID-19 pandemic continues to have an impact on our business. For example, opportunities for travel to conduct supplier audits continued to be limited in Financial Year 2022 due to international restrictions and, as a result, we have adapted our approach to ensure that we remain able to identify and mitigate modern slavery risks, and so we have maintained virtual contact with our suppliers.

During 2022 and as a result of the COVID-19 pandemic impacts, Aristocrat identified the emergence of a new supply risk to certain Gaming suppliers. This risk arises due to the constrained supply of electronic components through normal original equipment manufacturer and distribution channels. The inherent risk of modern slavery could be heightened if our suppliers looked to new, un-vetted channels to mitigate the supply risk. Aristocrat's approach to mitigating this modern slavery risk was to ensure we engaged and completed purchases with pre-approved component brokers on behalf of our Key Direct Suppliers and Sub-Tier Suppliers. These pre-approved component brokers had already agreed to Aristocrat's ethical sourcing clauses and the Supplier Code of Conduct, thus reducing potential modern slavery risk within our broader supply chain.

D. LOOKING AHEAD - OUR FUTURE ROADMAP

Aristocrat is currently considering its modern slavery roadmap activities for Financial Year 2023 and beyond, in consultation with all divisions of the Group.

1. Financial Year 2022

In the previous reporting period, Aristocrat identified the following themes as a focus for Financial Year 2022:

- Ongoing risk assessment and increasing risk maturity, to ensure that policies, procedures and risk mitigation measures remain risk-based and fit-for-purpose across our global operations and supply chain, and to address emerging areas of risk.
    - This was reflected in our risk assessments for Indirect Sourcing and operations in higher risk locations (see Section III.B.(2)), as well as our targeted risk assessments for distribution (Section III.B.(2)) and contingent workers (Section III.A.(2));
- Enhanced engagement and collaboration with suppliers, to ensure that suppliers fully understand our standards and expectations.
    - This was reflected in our Summit (see Section IV.D.(2)), Supplier Surveys (Section IV.I.(2)(a)), and continued application of our ethical sourcing and other contractual clauses (see Section IV.J); and
- Improving the knowledge fluency and skills of employees who are responsible for responding to actual or suspected modern slavery incidents, to ensure that we have a consistent approach that reflects the best practice principles set out in our new Incident Response Guide.
    - This was reflected in our implementation of modern slavery training for Pixel United (see Section IV.D.(1)), development of supplementary training for supplier-facing staff (Section IV.D.(1)), as well as the Summit. Additionally, as noted in Section IV.H, we have considered the incident response procedures and requirements in the Incident Response Guide when investigating and responding to queries received regarding modern slavery risks, as a way to ‘test’ these procedures on a preliminary basis.

2. Financial Year 2023

In Financial Year 2023, Aristocrat intends to focus on the following themes, in line with our strategic focuses:



Our Employees

- Continue to roll out new tailored modern slavery training for targeted groups of employees at higher risk of contact with modern slavery issues to further raise awareness.
- Increase engagement of our Anti-Modern Slavery Champions throughout the business.



Our Business Leaders

- Publish our Incident Response Guide related to modern slavery incidents and implementing associated processes with the relevant business stakeholders.
- Continue to implement our due diligence processes (as discussed in Section IV.I) across other parts of our business in a risk-based manner.



Our Supply Chain

- Continue to map out and assess the risks of modern slavery beyond our Tier 1 suppliers in a prioritised fashion.
- Continue to provide education on modern slavery risks to Key Direct Supplier and Sub-Tier Suppliers.



Our Community

- Collaborate with peers and the broader community to continue to learn, improve on and share our efforts to assess and address modern slavery risks.
- Investigate ways to leverage influence to mitigate against modern slavery risks, including engagement with community and other groups focused on modern slavery, ethical sourcing and human rights.

All these activities will assist Aristocrat in its efforts to continue to lift the maturity of our anti-modern slavery program, which is another area of focus for our business in the next reporting period and beyond.

VIII. Addressing mandatory criteria

The table below helps illustrate where you can find the criteria for the Australian Modern Slavery Act and the UK Modern Slavery Act addressed in this Statement.

Section in Modern Slavery Statement	Australian Modern Slavery Act	UK Modern Slavery Act
Page iii.	A statement must identify the reporting entity (section 16(1)(a))	
Section I (Who we are: our structure and business) and Section II (What we do: our operations and supply chain	A statement must describe the structure, operations and supply chains of the reporting entity (section 16(1)(b))	A statement may include information about the organisation's structure, its business and its supply chain (section 54(5)(a)
Section III (The risks of modern slavery in our operations and supply chains)	A statement must describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls (section 16(1)(c))	A statement may include information about the parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk (section 54(5)(d)
Section IV (The actions taken by us to assess and address these risks, including due diligence and remediation processes)	A statement must describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes (section 16(1)(d))	A statement may include information about the organisation's policies in relation to slavery and human trafficking (section 54(5)(b)), the organisation's due diligence processes in relation to slavery and human trafficking in its business and supply chains (section 54(5)(c)), and about the training available to its staff (section 54(5)(f))
Section V (Assessing the effectiveness of our actions)	A statement must describe how the reporting entity assesses the effectiveness of such actions (section 16(1)(e))	A statement may include information about the organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate (section 54(5)(e))
Section VI (Our consultation process)	A statement must describe the process of consultation with any entities that the reporting entity owns or controls; and in the case of a reporting entity covered by a statement under section 14—the entity giving the statement (section 16(1)(f))	
Section VII (Other Important Information)	A statement must include any other information that the reporting entity, or the entity giving the statement, considers relevant (section 16(1)(g))	
Section IX (Approval and signing)	For a joint modern slavery statement, the joint modern slavery statement must be approved and signed in accordance with one of the options set out in (section 14(2))	For bodies corporate, a statement must be approved by the board of directors and signed by a director (section 54(6)(a))

IX. Approval and signing

In accordance with section 14 of the Modern Slavery Act 2018 (Cth), this joint Modern Slavery Statement for Aristocrat Leisure Limited, Aristocrat International Pty Ltd, Aristocrat Technologies Australia Pty Limited and System 7000 Pty Ltd was approved by the Board of Aristocrat Leisure Limited as the parent entity on 23 February 2023, and the Board has delegated authority to Neil Chatfield, Chairman, and Trevor Croker, CEO and Managing Director, to jointly sign this joint Modern Slavery Statement on behalf of Aristocrat Leisure Limited:



Signature

Neil Chatfield

Chairman

23 February 2023

Date



Signature

Trevor Croker

CEO and Managing Director

23 February 2023

Date

In accordance with section 54 of the Modern Slavery Act 2015 (UK), this Modern Slavery Statement was approved by the Board of Product Madness (UK) Limited effective 23 February 2023, and the Board has authorised Yoav Ecker, a director of the board, to sign this Modern Slavery Statement on behalf of Product Madness (UK) Limited:



Signature

Yoav Ecker

Managing Director

23 February 2023

Date

In accordance with section 54 of the Modern Slavery Act 2015 (UK), this Modern Slavery Statement was approved by the Board of Aristocrat Technologies Europe Limited effective 23 February 2023, and the Board has authorised Craig Toner, a director of the board, to sign this Modern Slavery Statement on behalf of Aristocrat Technologies Europe Limited:



Signature

Craig Toner

CFO and EVP Operations

23 February 2023

Date


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