

GLOBAL WHISTLEBLOWER POLICY

REFERENCE

1.8

EFFECTIVE DATE

16 September 2025

OWNER

Group Risk and Audit

1. WHAT IS THE PURPOSE OF THIS POLICY?

Aristocrat is committed to maintaining the highest standards of corporate governance. We have no tolerance for non-compliance with our values and breaches of the policies and procedures, laws and regulations that govern our operations.

In line with our values, including “Good Business, Good Citizen” and “Talent Unleashed”, we are committed to strong, transparent practices, that empower our people to speak up.

An effective whistleblower program is a necessary element of good corporate governance. It assists in the detection of corrupt, illegal or other undesirable conduct. The Global Whistleblower Policy (the Policy) is designed to:

- encourage people to raise concerns about Reportable Conduct (refer to Section 3 for definition) knowing that their concerns will be taken seriously and investigated as appropriate;
- inform people that a framework exists to protect them from detrimental treatment which may be suffered by them as a result of raising a concern about Reportable Conduct; and
- outline how Aristocrat will respond to concerns raised under this Policy.

This Policy does not form part of any individual employment contract or terms and conditions of employment. Where it considers it is appropriate to do so, Aristocrat may depart from, replace, cancel or vary, this Policy from time to time in its absolute discretion.

Aristocrat operates globally and certain countries may have whistleblower related laws that affect the application of this Policy. A non-exhaustive summary of country-specific provisions that may affect the operation of this Policy is set out in the Attachments to this Policy. This Policy should be read in conjunction with the provisions applicable to the country in which a person is based and where there is an inconsistency between this Policy and an Attachment, the Attachment will prevail. This Policy does not permit conduct that would be unlawful, or prohibit conduct that would be permissible, in a certain country, as long as that conduct does not fall below the behavioural thresholds as defined within the core of this Policy, or result in a breach of any laws or regulations at a localised level.

2. WHO IS A DISCLOSER?

Under this Policy, a discloser is a current or past employee, officer, associate (i.e. director or secretary), contractor, or supplier (including an employee of a supplier) of Aristocrat who, anonymously or by name, raises concerns about suspected Reportable Conduct. A discloser can also be a relative or dependent of any of these people (or a dependent of a spouse of any of these people) who reports on suspected Reportable Conduct. Anyone with information about suspected Reportable Conduct is encouraged to raise a concern.

3. WHAT CAN BE REPORTED UNDER THIS POLICY?

Reportable Conduct includes, but is not limited to, criminal activity (such as theft, fraud, dishonesty, corruption), illegality, a breach of law or regulation, miscarriages of justice, a serious breach of internal policy, discrimination, harassment, unethical or improper behaviour, workplace safety issues, bribery, conduct that endangers the public or the financial system, any other misconduct or improper state of affairs or circumstances in relation to an Aristocrat company, or any other conduct which may cause financial or non-financial loss to Aristocrat or otherwise be detrimental to the interests of Aristocrat and its customers, including environmentally unsound practices.

Reportable Conduct also includes a deliberate concealment of any conduct meeting the above description.

Suspected Reportable Conduct can be reported under this Policy. However, this Policy generally does not apply to personal work-related grievances.

Personal work-related grievances are grievances relating to the discloser's current or former employment or engagement that has implications for that person personally and does not otherwise fall within the scope of Reportable Conduct. For example, an interpersonal conflict between two staff members, or a decision relating to employment or engagement, such as a transfer, promotion or disciplinary action of the person. For such grievances, employees are encouraged to approach their supervisor, management or People and Culture (P&C) directly.

A personal work-related grievance may still be covered by this Policy in certain situations. See Attachment 1 for details.

Nothing in this Policy is intended to prohibit or discourage anyone from reporting perceived wrongdoing to any government agency or regulatory body.

4. MAKING A REPORT UNDER THIS POLICY

Aristocrat will make available at all times an independent communication channel for a discloser to report on suspected Reportable Conduct. Please refer to section 10 for guidance on how to make a report through the independent communication channel.

Reports are treated confidentially and can be made anonymously if a discloser does not want to reveal their identity. A discloser can continue to remain anonymous over the course of the investigation and after the investigation is finalised to the extent possible and permitted by relevant law. However, sometimes due to the nature of the information disclosed in a report, it may be possible to identify the discloser.

While a discloser is encouraged to provide his or her name because it will make it easier for Aristocrat to address the disclosure (for example, the context in which the discloser may have observed the Reportable Conduct is likely to be useful information), they are not required to do so.

If a discloser does not provide their name, Aristocrat will assess the content of the disclosure in the same way as if the discloser had revealed their identity, and any investigation will be conducted as is possible in the circumstances. However, an investigation may not be possible unless sufficient information is provided, and it may make it difficult to offer the discloser the same level of practical support if Aristocrat does not know their identity.

5. DISCLOSER'S IDENTITY

Aristocrat's priority is to protect people who make disclosures about suspected Reportable Conduct. If a discloser makes a disclosure, their identity (and any information that we have because of the disclosure that someone could likely use to work out the person's identity) will only be disclosed if:

- the discloser gives consent for Aristocrat to disclose that information;
- the disclosure is allowed or required by law (for example, disclosure by Aristocrat to a lawyer to get legal advice relating to the law on whistleblowing); or
- in the case of information likely to identify the discloser, it is reasonably necessary to disclose the information for the purposes of an investigation, but all reasonable steps are taken to prevent someone from working out their identity.

If a discloser does not provide consent, this may limit Aristocrat's ability to progress the disclosure and take appropriate action.

6. RECEIPT OF REPORT

Reports made under this Policy will be received and treated sensitively and seriously. Suspected Reportable Conduct reported via the independent communication channel will be shared with one or more of the Group Head of Risk and Audit (GHRA), Chief Financial Officer, the Company Secretary (also Group Legal representative) and/or their respective delegates, provided that any report of suspected Reportable Conduct concerning any of these individuals will not be shared with the individuals concerned. To properly investigate a report, the report may need to be further shared with others, including external advisors or authorities, and will remain subject to confidentiality and other applicable restrictions.

Matters which do not amount to suspected Reportable Conduct will be dealt with through the normal channels in accordance with Aristocrat's policies and procedures.

7. RESPONSE AND INVESTIGATION

While making a report does not guarantee that the Reportable Conduct will be formally investigated, all reports will be assessed by Aristocrat and a decision made as to whether to investigate. Aristocrat will endeavour to contact a discloser, acknowledging the report, within one business day of receiving their disclosure.

Any investigations commenced will be conducted in a timely manner (as appropriate in the circumstances) and will be independent from any persons to whom the report relates. While timelines will vary depending on the investigation and any applicable local laws, Aristocrat endeavours to conclude investigations within eight weeks from receipt of the report. Investigations will generally be overseen by the GHRA. Other people, including employees or external advisers, may also be asked to assist or run the investigation.

Aristocrat's response to a report will vary depending on the nature and method of the disclosure (including the amount of information provided). If a disclosure does not include all relevant facts, there may be insufficient information to investigate the suspected Reportable Conduct.

All employees and contractors must cooperate fully with any investigations and maintain confidentiality over the proceedings at all times. Any breaches of confidentiality will result in serious disciplinary actions being taken by the organisation.

Unless there are confidentiality or other reasons not to do so, persons to whom the disclosure relates will be informed of the concerns at an appropriate time, and will be given a chance to respond to concerns raised against them. Any response provided will be considered by Aristocrat for the purposes of making any findings as part of any investigation.

Investigations into suspected Reportable Conduct may conclude with a formal report from the GHRA or the investigator (as applicable, including any external investigator), which may include findings on the allegations. The report is confidential and the property of Aristocrat. Findings will be made on the balance of probabilities based on the evidence available and will be recorded as substantiated, partly substantiated, not substantiated or unable to be substantiated.

Aristocrat does not assume any liability to inform disclosers of the progress of Aristocrat's response or any investigation but, where appropriate to do so, disclosers will be told how Aristocrat has decided to respond to their disclosure, including whether an investigation will be conducted. Aristocrat will also endeavour to provide disclosers with regular updates of the status of any investigation and findings, if appropriate. However, it may not always be appropriate to provide disclosers with this information, and it may not be possible unless the discloser's contact details are provided when the report is made.

Any formal report from the GHRA or investigator (as applicable) will not be provided to a discloser or any person subject to investigation. Any report will be handled confidentially and in accordance with applicable law.. Subject to this and depending on the nature of the allegations and investigation outcomes, the report may be shared internally as necessary to report on or take other action to address the matters raised in a disclosure. In rare circumstances, the formal report may be shared with a regulatory body or law enforcement agency to support further investigation.

The Board Audit Committee receives appropriate summary information and metrics regarding Reportable Conduct disclosures made under this Global Whistleblower Policy (including the outcome of any investigation) on at least a quarterly basis.

8. HOW ARE DISCLOSERS PROTECTED?

Aristocrat is committed to protecting disclosers against actions taken against them for reporting genuinely suspected Reportable Conduct. This section outlines the measures which may be taken by Aristocrat to protect those who make a report.

a) Protecting Disclosers' Identities

Aristocrat will adopt measures as appropriate to protect a discloser's identity, which may include some or all of the following:

- using a pseudonym in place of the discloser's name;
- if the discloser chooses to remain anonymous, communicating with the discloser through the anonymous avenues available through the independent communication channel;
- redacting personal information or references to the discloser;
- referring to the discloser in a gender-neutral context;
- where possible, consulting with the discloser to help identify the aspects of their disclosure that could inadvertently identify them;
- ensuring paper and electronic documents and other materials relating to disclosures are stored securely;
- limiting access to all information relating to a disclosure to those directly involved in managing and investigating the disclosure or who are directly involved in any other response to the disclosure;

- reminding each person who is involved in handling and investigating a disclosure about the confidentiality requirements, including the consequences of an unauthorised disclosure;
- subject to the discloser's consent, only disclosing their identity or information that is likely to lead to their identification to a restricted number of people who are directly involved in handling and investigating the disclosure or who are directly involved in any other response to the disclosure; and
- providing periodic training to "eligible recipients" and others involved in handling and investigating disclosures about the confidentiality requirements.

b) Protecting Disclosers from Detriment

Disclosers must not suffer any detrimental treatment as a result of raising a concern about Reportable Conduct. Detrimental treatment may include (but is not limited to) dismissal, threats or other unfavourable treatment due to raising a disclosure.

Aristocrat does not tolerate any reprisals, discrimination, harassment, intimidation or victimisation against a discloser, his or her colleagues or family members. Any retaliatory action may be treated as serious misconduct and will be dealt with in accordance with relevant legislation and Aristocrat's disciplinary procedures. An individual may also be exposed to criminal or civil liability for a breach of relevant legislation.

This does not prevent Aristocrat from raising and addressing with a discloser (who is an employee, officer, associate, contractor or supplier of Aristocrat) matters that arise in the ordinary course of their employment or contractual relationship (for example, any performance or conduct concerns) or taking appropriate action if a concern is raised which the discloser knows to be untrue.

c) Other Protections Available

Aristocrat may offer protections to a discloser at its discretion, depending on things such as the nature of the Reportable Conduct and the people involved. Protections may include the following:

- monitoring and managing the behaviour of other employees;
- offering relocation to individuals (which may include the people alleged to have been involved in the Reportable Conduct) to a different business unit, group or office; or
- offering an individual a leave of absence or flexible workplace arrangement while a matter is investigated.

Aristocrat will look for ways to support all people who make a report of genuinely suspected Reportable Conduct, but it will of course not be able to provide non-employees with the same type and level of support that it provides to employees. Where this Policy cannot be applied to non-employees, Aristocrat will still seek to offer as much support as reasonably practicable.

9. RESPONSIBILITIES OF EMPLOYEES UNDER THIS POLICY

Workers

It is the responsibility of all Aristocrat employees, officers, associates and contractors to:

- Assist in any investigation resulting from a discloser's report, if requested.
- Protect the confidentiality of the discloser and any other witnesses referred to or involved, as required by applicable law and to the extent permitted by law.
- Take all reasonable steps to protect the discloser from any detrimental conduct as a result of the discloser having made a genuine disclosure of suspected Reportable Conduct.

Disclosers

When raising a concern, a discloser is expected to have reasonable grounds to suspect that the information they are disclosing is true and accurate to the best of their knowledge and belief. Where it is found that a discloser has knowingly made a false or malicious report, this will be considered a serious matter and may result in disciplinary action. There may also be legal consequences if a person knowingly makes a false report.

10. HOW TO MAKE A REPORT

Disclosers are strongly encouraged to take due care and exhaust internal escalation channels (EthicsPoint or internal Eligible Recipient), prior to communicating information regarding a disclosure externally. In particular, the discloser should strongly consider making a disclosure to Aristocrat in accordance with this Policy before communicating the matter to external parties, including the media or regulatory body.

Disclosures about suspected Reportable Conduct can be made through Aristocrat's Whistleblower Program, which can be accessed either through the dedicated EthicsPoint Hotline or EthicsPoint Web Intake Site, which are available 24 hours a day, 365 days a year.

EthicsPoint is a confidential, independent communication program provided by NAVEX Global, a third-party ethics and compliance specialist, contracted by Aristocrat.

EthicsPoint Website: www.aristocrat.ethicspoint.com

Dedicated EthicsPoint Phone Hotlines:

REGION	TOLL FREE NUMBER
Argentina	800-345-2568 (Spanish)
Australia	1-800-40-8934
Austria	0800 298973 (German)
Bulgaria	0800 46 349 (Bulgarian)
Canada	1-855-350-9393 (French Canadian)
China	4001200035 (Mandarin, Cantonese)
Croatia	0800 806 231 (Croatian, Serbian)
Cyprus	80090717 (Greek, Turkish)
Czech Republic	800880984 (Czech)
Estonia	8000100923 (Estonian)
Germany	0800 1824126 (German)
India	022 5032 3047 (Hindi)
Israel	180-931-7130 (Hebrew, Arabic)
Malaysia	1800-81-0939 (Malay)
Malta	80065166
Mexico	001-877-388-9168 (Spanish)
Netherlands	0800 0232385 (Dutch)
New Zealand	0800 446 678
North Macedonia	0800 8 05 47 (Macedonian)
Philippines	02 8395 3449 (Tagalog)
Poland	800005128 (Polish)
Puerto Rico	1-877-247-3532 (Spanish)
Romania	0800 890 661 (Romanian)
South Africa	080 098 5113 (Afrikaans)
South Korea	00744880 (Korean)
Spain	900751977 (Castilian Spanish)
Taiwan	00801-49-1323 (Mandarin)

REGION	TOLL FREE NUMBER
Thailand	1800018213 (Thai)
Ukraine	0800 800 657 (Ukrainian)
United Kingdom & North Ireland	0808 169 6534
USA	1-877-247-3532

When an individual contacts the EthicsPoint Hotline or EthicsPoint Website they will be asked a series of questions to assist with the understanding of the suspected Reportable Conduct, including the location, timing and involved parties.

Suspected Reportable Conduct reported via the independent communication channel is notified to one or more of the GHRA, the CFO, the Company Secretary (also Group Legal representative) and/or their respective delegates, who will review the report and determine a course of action to respond, in accordance with applicable policies and procedures.

Acknowledgement that a report of suspected Reportable Conduct has been responded to will be provided on the EthicsPoint Website and may be accessed by the discloser. Additional information or consent required to fully investigate a report of suspected Reportable Conduct (if applicable) may also be requested by the GHRA or their delegate from the discloser via the independent communication channel.

11. DATA PROTECTION

Disclosers may also be asked to acknowledge that Aristocrat may collect, use, store, transfer and otherwise process their personal data including providing personal data to third parties and transferring personal data within and outside the discloser's local employment region, in accordance with applicable data protection regulations.

Further details relating to the processing of such personal data are set out in Aristocrat's Privacy and Data Breach Policies, which are non-contractual and may be amended from time to time.

12. AVAILABILITY OF THIS POLICY AND TRAINING

Each employee (including new employees) will have this Policy made available to them and be provided with training about the Policy and their rights and obligations under it. Training will also be provided to individuals who receive reports about Reportable Conduct or otherwise have a role under this Policy, including in relation to how to respond to disclosures.

A copy of this Policy is available on Aristocrat's website and on the Aristocrat intranet within Policy Hub. This Policy will be periodically reviewed to ensure that it is operating effectively and to identify if any changes are required to the Policy.

Any questions about this Policy can be referred to the GHRA.

13. REVIEW OF THIS POLICY

Aristocrat will endeavour to review this policy at least annually to ensure compliance with applicable whistleblower laws across its global operations.

ATTACHMENT 1: AUSTRALIA

1.0 WHEN LEGISLATIVE PROTECTIONS MAY APPLY

Under Australian law (in particular, the *Corporations Act 2001* (Cth)) (**Act**), legislative protections are available to certain persons (including current and former employees, officers, and suppliers (including their employees), as well as their relatives and dependents of those individuals) who make a "protected disclosure" to certain people.

Aristocrat encourages people to make a disclosure in accordance with this Policy, as set out above. However, the law offers the same protections if a person makes a "protected disclosure" to the people identified in this Attachment, or to certain other persons. Details of those persons to whom a "protected disclosure" can be made are set out in Section 2.0 below.

Further details of some specific protections and remedies available to those who make a "protected disclosure" are set out in Section 3.0 below.

Please contact Aristocrat's Company Secretary or GHRA for more information about making a disclosure and the protections available under the law.

2.0 PROTECTED DISCLOSURES

To qualify for protection under the Act, a "protected disclosure" must relate to a "disclosable matter" and be made to an "eligible recipient" whose role it is to receive protected disclosures under the Act. A disclosure can still qualify for protection even if it turns out to be incorrect or is unsubstantiated. Examples of this type of information and recipients are outlined in the following table:

INFORMATION REPORTED OR DISCLOSED	RECIPIENT OF DISCLOSED INFORMATION
<ul style="list-style-type: none"> Information about misconduct, or an improper state of affairs or circumstances in relation to Aristocrat or a related body corporate. Information that Aristocrat, a related body corporate or any officer or employee of such entities has engaged in conduct that: <ul style="list-style-type: none"> contravenes or constitutes an offence against certain legislation (e.g. the Corporations Act); represents a danger to the public or the financial system; or constitutes an offence against any law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more. <p>Note that "personal work-related grievances" are not protected disclosures under the law.</p>	<ul style="list-style-type: none"> A person authorised by Aristocrat to receive protected disclosures under this Policy. An officer or senior manager* of Aristocrat or of a related body corporate. An auditor, or a member of an audit team conducting an audit, of Aristocrat or of a related body corporate. An actuary of Aristocrat or of a related body corporate. ASIC or APRA. A legal practitioner for the purposes of obtaining legal advice or legal representation (even if the legal practitioner concludes the disclosure does not relate to a disclosable matter).

*Aristocrat considers a **senior manager** to mean Executive Steering Committee (ESC) members and Managing Directors or Presidents within Business Units (at the date of the Policy being Aristocrat Interactive, Gaming and Pixel United).

Personal work-related grievances

Legal protection for disclosures about solely personal employment related matters are only available under the law in limited circumstances. A disclosure of a personal work-related grievance will remain protected if it relates to:

- detriment that has been suffered or is threatened because an individual has raised a concern about suspected Reportable Conduct;
- both a personal work-related grievance and other misconduct under this Policy; or
- concerns that Aristocrat has breached employment or other laws punishable by imprisonment for a period of 12 months or more.

Emergency and public interest disclosures

The law also protects certain disclosures made in "emergency" and "public interest" situations, in which case disclosures can be made to journalists** or Parliamentarians.

However, prior to taking such action, it is strongly encouraged the discloser exhaust all internal escalation channels available. In particular, the Discloser should strongly consider the following options before outside communication:

- utilising EthicsPoint, the independent communication channel to make the disclosure, allowing the organisation to respond in accordance with this Policy; or
- reporting the suspected Reportable Conduct to an "eligible recipient", allowing the organisation to respond in accordance with this Policy.

It is important for a discloser to understand the criteria for making a public interest or emergency disclosure before doing so. For example, a discloser should be aware that to qualify for protection as a public interest or emergency disclosure:

- a disclosure must have previously been made to ASIC, APRA or another prescribed regulatory body and written notice provided to them of the intention to make a public interest or emergency disclosure;
- in the case of a public interest disclosure, at least 90 days must have passed since the previous disclosure was made and the discloser must have reasonable grounds to believe that making a further disclosure is in the public interest; and
- in the case of an emergency disclosure, the discloser must have reasonable grounds to believe that the information concerns a substantial and imminent danger to the health and safety of a person or the natural environment.

These criteria are not exhaustive, and a discloser should contact an independent legal adviser before making an emergency or public interest disclosure.

A **journalist is a person who is working in a professional capacity as a journalist for: a newspaper or magazine; a radio or television broadcasting service; or an electronic service (including a service provided through the internet) that is operated on a commercial basis or by a national broadcasting service and is similar to a newspaper, magazine or radio or television broadcast.

3.0 SPECIFIC PROTECTIONS AND REMEDIES

If a person makes a "protected disclosure", the law provides:

- it is illegal for a person to identify the discloser, or disclose information that is likely to lead to the identification of the discloser, except in certain circumstances (Refer to Section 5 of the Policy: Discloser's Identity);
- the person is not subject to any civil, criminal or administrative liability for making the disclosure;
- no contractual or other remedy may be enforced or exercised against the person on the basis of the disclosure;
- in some circumstances (e.g. if the disclosure has been made to a regulator), the information the person provides is not admissible in evidence against the person in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information; and
- the person is protected from detrimental acts or omissions in relation to making the disclosure and can seek compensation and other remedies through the Courts if they suffer loss, damage or injury because of a disclosure and Aristocrat has failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

Additional legislative protections and remedies may also be available.

ATTACHMENT 2: UNITED KINGDOM

1.0 PROTECTIONS UNDER UK LAW

Only employees and workers are afforded statutory protection under The Public Interest Disclosure Act 1998 (**PIDA**). They are protected by law from being detrimentally treated for making a "*protected disclosure*" under the PIDA. The dismissal of a whistleblower who is an employee will be automatically unfair if the reason, or principal reason, for their dismissal is that they have made a "*protected disclosure*".

2.0 Protected disclosures

A "*protected disclosure*" is a disclosure of information, for which the employee or worker has a reasonable belief, that such disclosure is about:

- a breach of a legal obligation;
- criminal activity;
- miscarriages of justice;
- health and safety breaches;
- damage to the environment; and
- the deliberate concealing of information about any of the above.

Further, the employee or worker must have a reasonable belief that the disclosure is in the public interest.

3.0 WHEN SHOULD THE WHISTLEBLOWER PROGRAM BE USED?

If a discloser suspects "Reportable Conduct" (as defined in the Global Whistleblower Policy), they are encouraged to use the independent communication channel set out in the Global Whistleblower Policy. However, in some cases, it may be appropriate for the discloser to raise concerns with someone else within the organisation, either in person or in writing. The law recognises that in some circumstances it may be appropriate for a discloser to report their concerns to an external body such as a regulator. It will very rarely ever be appropriate to alert the media. Disclosers are strongly encouraged to seek advice before reporting a concern to anyone externally.

4.0 REPORTING DISCLOSURES TO THE AUTHORITIES

The relevant Aristocrat entities in the UK may, depending on the circumstances, choose to make a disclosure to a relevant authority as it sees fit, and nothing in the Global Whistleblower Policy will override this.

5.0 DISCIPLINARY PROCESSES

Notwithstanding the Global Whistleblower Policy, a person who is the subject of disciplinary proceedings as a result of any disclosure made, may be provided with the relevant information from the disclosure/report to enable them to participate fairly in such proceedings. The subject of the disciplinary proceedings may be provided with all of or part of the report which will be dependent on the allegations against them and their ability to properly state their case.

ATTACHMENT 3: NEW ZEALAND

The Protected Disclosures (Protection of Whistleblowers) Act 2022 (NZ) (**Act**) provides protections at law to eligible whistleblowers (“**disclosers**”) who make a “**protected disclosure**” of “**serious wrongdoing**” to Aristocrat or to an “**appropriate authority**” (each as defined under the Act).

To be a protected disclosure qualifying for protection under the Act, a discloser must:

- be a “discloser” as defined under the Act which includes current or former employees, secondees, contractors, persons concerned in the management of Aristocrat, and volunteers;
- believe on reasonable grounds that there is, or has been, “serious wrongdoing” (as defined) in or by Aristocrat;
- disclose information about that in accordance with the Act; and
- not disclose information in bad faith.

The Act does not apply to other disclosures of Reportable Conduct made under this Policy but which do not constitute “serious wrongdoing”.

ATTACHMENT 4: SPAIN

1.0 PROTECTIONS UNDER SPANISH LAW

In addition to the categories of disclosers listed in the Global Whistleblower Policy, Spanish law (Law 2/2023 of 20 February ("**Law 2/2023**")) protects disclosers who are volunteers, trainees, any person working for third parties (e.g. subcontractors), disclosers whose employment relationship has not yet started, any person who has assisted the discloser and specifically the discloser's legal representatives in the exercise of their functions of advising and supporting the discloser. Only disclosers falling within the categories that are protected by Law 2/2023 will have protections under Spanish whistleblowing laws when reporting a "*protected disclosure*" as set out below.

2.0 PROTECTED DISCLOSURES

A "*protected disclosure*" is defined in the Global Whistleblower Policy but for disclosers protected under Law 2/2023 in Spain specifically includes all communications relating to:

- a) Infringements of European Union law where they (i) affect any of the matters listed in Annex I of the European Whistleblowing Directive, (ii) affect the financial interests of the European Union or (iii) have an impact on the internal market;
- b) serious or very serious administrative breaches; or
- c) criminal offences.

Protected disclosures may be made in writing or verbally.

3.0 REPORTING DISCLOSURES TO THE AUTHORITIES

In addition to the internal channels available to a discloser as set out in the Global Whistleblower Policy, a discloser under article 3 of Law 2/2023 may choose to make a *protected disclosure* provided for in Law 2/2023, to the Independent Discloser Protection Authority (*Autoridad Independiente de Protección del Informante*, or **A.P.I**) either directly or after having previously submitted a report through the internal reporting channels and may also refer to institutions, authorities or organisations of the European Union. Likewise, the discloser may publicly disclose information on acts or omissions to the extent provided for in Law 2/2023.

4.0 RECEIPT OF REPORT, RESPONSES AND INVESTIGATION

Upon receipt of a *protected disclosure* from the discloser under Law 2/2023, Aristocrat shall send an acknowledgement of receipt to the discloser within seven (7) calendar days (unless this could jeopardise the confidentiality of the communication). The maximum period for responding to the *protected disclosure* is set at three (3) months starting after the initial seven (7) day period has elapsed, except in cases of particular complexity that require an extension of the period, in which case it may be extended for an additional three (3) months.

5.0 SPECIFIC PROTECTIONS AND REMEDIES UNDER SPANISH LAW

Law 2/2023 provides specific protections, including:

1. Any actions that may be deemed to be retaliatory conduct (as referred to in the Global Whistleblower Policy) taken against a discloser within two years of the investigation being declared null and void. Examples of retaliatory conduct expressly set out in Law 2/2023

- include but are not limited to: termination of contracts, intimidation, unfavourable treatment and reputational damage;
2. Disclosers and/or those persons directly involved in the reported events have the right to: (i) a presumption of innocence, (ii) fair defence, (iii) access to their file, and (iv) confidentiality; and
 3. Support provided to disclosers from the A.P.I, to ensure that the protective measures set out in Law 2/2023 are effective.

6.0 RIGHTS OF THE DATA SUBJECTS

All data subjects may exercise their rights foreseen within the applicable data protection regulations.

ATTACHMENT 5: MALTA

1.0 PROTECTION UNDER MALTA LAW

In terms of the whistleblower protection under this Global Whistleblower Policy, in a Malta context, as shall be defined below, domestic whistleblower law emanates from European Union legislation, going over and above the latter, established by the Protection of the Whistleblower Act, Chapter 527 of the Laws of Malta (hereinafter the “Whistleblower Act” or “Applicable Malta Law”).

The phrase “in a Malta context” shall be construed as covering employees employed with Aristocrat’s Malta branch, or any improper practice (‘Reportable Conduct’ as specified in section 2 of this Global Whistleblower Policy and extended by section 3.0 of this Attachment) which is reportable in the context of the Whistleblower Act and the Maltese jurisdiction.

This Attachment shall apply and supersede the Global Whistleblower Policy in a Malta context, in terms of the matters or provisions which are in conflict with Applicable Malta Law, as per below.

2.0 WHO IS A DISCLOSER?

In accordance with Applicable Malta Law which specifies employees as individuals qualifying to be protected disclosers – under the Whistleblower Act’s definition of ‘whistleblower’ - Aristocrat’s Global Whistleblower Policy shall, in a Malta context, be construed to cover employees of Aristocrat and prescribed persons (as defined below) under the Whistleblower Act.

In terms of Applicable Malta Law, in a Malta context, a contractor, subcontractor or volunteer to Aristocrat in the course of its day-to-day activities and/or initiatives, shall also fall under the definition of an employee of Aristocrat, in accordance with the Whistleblower Act’s definition of ‘employee’ - in terms of protected disclosers under this Global Whistleblower Policy.

In a Malta context, in accordance with the above, the following prescribed persons in terms of the Whistleblower Act, shall also be afforded the protection of protected disclosers in terms of this Global Whistleblower Policy (hereinafter the “**prescribed persons**”):

- (i) Facilitators, which should be construed as a person who assists a reporting person in the reporting process in a work-related context, and whose assistance should be confidential;
- (ii) Third persons concerned with reporting persons and who could suffer retaliation in a work-related context, such as colleagues or relatives of the reporting persons; and
- (iii) Legal entities that the reporting persons own or work for.

3.0 WHAT CAN BE REPORTED UNDER THIS POLICY?

In a Malta context, the following shall also fall under such scope of Reportable Conduct in terms of this Global Whistleblower Policy by Aristocrat’s employees, contractors, subcontractors and volunteers and prescribed persons (‘improper practice’ under the Whistleblower Act):

- The prevention of money-laundering and terrorist financing (AML/CFT);
- Consumer protection (as applicable, presumably in terms of domestic Gaming Laws); and
- Protection of privacy and personal data, and security of network and information systems to which Aristocrat is subject.

In a Malta context, a ‘breach affecting the financial interests of the European Union’ and a ‘breach relating to the internal market’ (sub-article (p) and (q) under the Whistleblower Act’s definition of ‘improper practice’) are to be considered included within the meaning of “conduct that endangers the

public or the financial system” as Reportable Conduct in terms of this Global Whistleblower Policy.

4.0 MAKING A REPORT UNDER THIS POLICY

Further to Article 11 of the Whistleblower Act, whilst Aristocrat may take anonymous disclosures into consideration for the purposes of determining whether improper practice has occurred (Article 11(2) of the Whistleblower Act), in a Malta context, disclosures made anonymously are not afforded protected disclosure status in terms of Applicable Malta Law (Article 11(1) of the Whistleblower Act).

5.0 DISCLOSER'S IDENTITY

In reference to the reasons mentioned in section 5 of this Global Whistleblower Policy for which information may be shared with third-parties – apart from disclosing to Aristocrat itself – which may consequently disclose the whistleblower's identity: in a Malta context, further to Article 6(1) of the Whistleblower Act, express consent shall be required in all such instances, with no exception (Article 6(4) of the Whistleblower Act).

6.0 RECEIPT OF REPORT

In terms of sharing with third parties or otherwise, refer to section 5 of this Attachment, immediately above.

7.0 HOW ARE DISCLOSERS PROTECTED?

a) Protecting Disclosers from Detriment

In line with Applicable Malta Law, the following shall also be covered under this Policy as detrimental action in a Malta context, as per the Whistleblower Act's definition of 'occupational detriment':

- Transfers
- Promotions/demotions
- Disciplinary action.

b) Other Protections Available

In a Malta context, the whistleblower shall have access from Aristocrat, free of charge, to comprehensive and independent information and advice on procedures and remedies available, on protection against retaliation, and on the rights of the person concerned. Aristocrat shall also render accessible, clear information on the existence of internal procedures, as well as such information for reporting externally to the competent authorities in Malta, not covered by this Global Whistleblower Policy (Article 12(2) of the Whistleblower Act). In terms of this Global Whistleblower Policy, the whistleblower is advised to direct their disclosure to the head or deputy head of Aristocrat's Malta operations (Managing Director, White Label) instead of Aristocrat's reporting officer where the whistleblower has reason to suspect the integrity or involvement of the latter in the improper practice (Article 14 of the Whistleblower Act).

8.0 WHAT ARE THE RESPONSIBILITIES OF EMPLOYEES UNDER THIS POLICY

Further to the above, this Global Whistleblower Policy excludes protection to employees, contractors, subcontractors and volunteers to Aristocrat as well as the prescribed persons under the Whistleblower Act where they ought to have reasonably known that the information disclosed is false.

9.0 HOW TO MAKE A REPORT

In a Malta context, in accordance with Applicable Malta Law, Aristocrat shall be responsible for scheduling a physical meeting with the whistleblower, within a responsible timeframe where at the whistleblower's discretion, the latter opts for such, in lieu of the Hotline or Web intake site.

ATTACHMENT 6: CZECH REPUBLIC

1.0 VOLUNTARY WHISTLEBLOWING HOTLINE OPERATION IN THE CZECH REPUBLIC

Aristocrat and its related entities employ together less than 50 employees in the Czech Republic and at the same time do not act as so called “obligated persons” (in Czech: *povinné osoby*) under Czech Anti-Money Laundering (AML) law, which requires implementation of whistleblowing hotline regardless the number of employees. Therefore, Aristocrat and its related entities are not legally obliged to operate whistleblowing hotline under the Czech Act No. 171/2023 Sb., on Protection of Whistleblowers (the “**Czech Whistleblowing Act**”).

Considering the above, this Global Whistleblowing Policy as well as the Global Aristocrat’s Whistleblower Program have been implemented on voluntary basis outside the regime of the Czech Whistleblowing Act.

ATTACHMENT 7: NORTH MACEDONIA

1.0 PROTECTION UNDER THE NORTH MACEDONIAN LAW

In addition to the categories of disclosers protected under the Global Whistleblower Policy, the *Law on Protection of Whistleblowers "LPW"*, provides protection to the following additional groups of disclosers:

- applicants for employment/volunteering/internship;
- persons who are or have been volunteers or interns;
- customers and any person who, on any basis, is or was in a business relationship or other relationship of cooperation with the legal entity for which he/she reports.

2.0 REPORTING DISCLOSURES TO THE AUTHORITIES AND PUBLIC DISCLOSURE

In addition to the protected disclosure via internal independent communication channel according to the Global Whistleblower Policy, protected disclosure in North Macedonia can also be made i) by reporting the Reportable Conduct to public authorities ("**Protected External Disclosure**"), such as: the Ministry of Internal Affairs, the Public Prosecutor's Office, the State Commission for the Prevention of Corruption, the Ombudsman of the Republic of North Macedonia or other competent institutions in North Macedonia, and (ii) by publicly reporting the Reportable Conduct ("**Protected Public Disclosure**"), under the terms of the LPW and relevant bylaws.

3.0 PROTECTING DISCLOSERS IDENTITY

The discloser's identity shall not be disclosed to the person/s to whom the Reportable Conduct refers.

ATTACHMENT 8: BULGARIA

1.0 PROTECTIONS UNDER BULGARIAN LAW

In addition to the categories of disclosers listed in the Global Whistleblower Policy, the following persons are subject to protection and are authorised to be a discloser under the Bulgarian law (in particular the *Act on Protection of Persons, Reporting Information, or Publicly Disclosing Information about Breaches 2023* (Whistleblowers Protection Act)) (**WPA**):

- a volunteer, paid or unpaid intern;
- a partner, a shareholder, a sole owner of the capital, a member of the management or supervisory body of the company, a member of the audit committee;
- any contractors and subcontractors, as well as their employees;
- job applicants and potential service providers where the information about the Reportable Conduct was received during the selection process or other pre-contractual relations;
- any person where the information about the Reportable Conduct was received in the framework of service or other relationship, which has been terminated at the time of the report;
- any person who has assisted the discloser in the disclosure process;
- persons who are connected with the discloser in a work-related context or relatives of the discloser who could suffer retaliation as a result of the disclosure; and
- legal entities which the discloser holds a shareholding, for which the discloser works or with whom the discloser is otherwise connected in a work-related context.

2.0 PROTECTED DISCLOSURES

A “Protected Disclosure” under the Bulgarian law is a disclosure of information, for which the discloser has a reasonable belief that the information is correct and the Reported Conduct concerns:

- a) breaches of Bulgarian legislation or acts of the European Union in the field of:
 - public procurement;
 - financial services, products and markets, and prevention of money laundering and terrorist financing;
 - safety and compliance of products;
 - transport safety;
 - protection of the environment;
 - radiation protection and nuclear safety;
 - food and feed safety, animal health and welfare;
 - public health;
 - consumer protection;
 - respect for privacy and protection of personal data;
 - security of network and information systems;
- b) breaches affecting the financial interests of the European Union (EU);
- c) breaches of the rules of the EU internal market, competition and state aid;
- d) breaches relating to corporate taxation, including but not limited to cross-border schemes, aiming to illegally obtain a tax advantage;
- e) any criminal matter which the discloser has become aware of in connection with or during performance of the work duties;
- f) breaches of the Bulgarian legislation in the field of due public payments and municipal debts;
- g) breaches of the Bulgarian legislation in the field of employment legislation and performance of civil service legislation;

Protected Disclosures relating to any of the areas above in Bulgaria, shall be reported to the

Whistleblowing Officer for Bulgaria in writing, including by e-mail, or orally. Any Reportable Conduct relating to legal areas outside of the above list will be handled pursuant to the Global Whistleblower Policy.

3.0 HOW TO MAKE A REPORT

Internal channel

Disclosers making a Protected Disclosure in Bulgaria are directed and encouraged to submit any concerns directly to the Whistleblowing Officer for Bulgaria using the details below.

Whistleblowing Officer for Bulgaria

In writing:	Aristocrat Technologies - 140 G. S. Rakovski Str, Floor 3, Sofia, Bulgaria, 1000 To the attention of: Dessislava Kamenova
E-mail:	[!] Dessislava.Kamenova@aristocrat.com
Phone:	[!] +359 88 520 6296
In person:	[!] Dessislava Kamenova, P&C Partner

Where a Protected Disclosure relating to Bulgaria has not been submitted directly to the Whistleblowing Officer for Bulgaria, but to any of the channels in Section 10 of the Global Whistleblower Policy, Aristocrat shall promptly forward the disclosure to the Whistleblowing Officer for Bulgaria.

External channel

Should a discloser not wish to raise a concern internally, they may consider reporting their concerns before the competent body for external reporting in Bulgaria – the Bulgarian Commission for Personal Data Protection ("CPDP"). Please refer to the website of the authority for further information about external reporting: <https://cpdp.bg/>.

4.0 DISCLOSER'S IDENTITY

In order for a disclosure to be a Protected Disclosure under the WPA, the disclosure must relate to a matter listed in section 2.0 of this Attachment 8 and not be submitted anonymously. Anonymous disclosures are inadmissible under the WPA and Aristocrat is not under an obligation to investigate these matters further as a matter of Bulgarian law, but may choose to do so in accordance with this Global Whistleblower Policy.

5.0 PROCESS FOR HANDLING PROTECTED DISCLOSURES UNDER THE WPA

Within seven (7) days following receipt of a Protected Disclosure, the Whistleblowing Officer for Bulgaria shall confirm receipt to the discloser. Upon receipt of a Protected Disclosure, the Whistleblowing Officer for Bulgaria shall assess whether it is admissible as per Bulgarian statutory requirements. Inadmissible complaints to which no consideration will be given and no proceedings will be initiated under the Bulgarian law are as follows:

- disclosures relating to legal areas outside those listed in Section 3 above;
- disclosures which are submitted anonymously; and

The above disclosures are subject to other internal review outside of the framework/process and protection of the Bulgarian law. In this sense, the above disclosures may still be reviewed under the Global Whistleblower Policy insofar as they may still fall thereunder.

Protected Disclosures should contain certain mandatory information to be admissible. If the Whistleblowing Officer for Bulgaria identifies any deficiencies and/or missing information in the disclosure, it shall request from the discloser to remedy those within a seven (7) day term. Otherwise,

the report will be returned to the discloser and no internal investigation will be initiated.

Where the Whistleblowing Officer for Bulgaria determines that a disclosure falls within the areas listed in Section 3.0 above and contains all required information, it shall initiate an internal investigation on its merits.

The Whistleblowing Officer for Bulgaria will keep the discloser informed of the progress of the investigation and may contact the latter if any additional information, documents, or evidence are required. As part of the investigation process, an opportunity to object to the report would be provided to the person against whom the report has been submitted without disclosing the identity of the discloser.

Within a term of three (3) months as of acknowledgement of receipt of the report/concern, the Whistleblowing Officer for Bulgaria shall provide feedback to the discloser on the status of the investigation and the actions undertaken in this regard.

6.0 ACTIONS UPON COMPLETION OF THE INVESTIGATION

If the facts and circumstances presented in the report are confirmed during the internal investigation, the Whistleblowing Officer for Bulgaria shall:

- arrange for appropriate follow-up/corrective actions to be taken in relation to the report, which may require the assistance of other persons/units within the company;
- propose specific measures to Aristocrat to stop or prevent the breach (where such has been identified) or where there is a real risk of a breach being committed;
- refer the discloser to the competent authorities where his/her rights are affected;

Based on the report and the suggestions of the Whistleblowing Officer for Bulgaria, Aristocrat shall take appropriate corrective actions to stop the breach or to prevent it if it has not occurred.

Aristocrat may close the internal investigation where:

- the reported breach is of minor importance and does not require further follow-up action or internal action is taken;
- the disclosure repeats a previous report, which has already been investigated and decided by Aristocrat (unless new legal or factual circumstances are presented which require further action);
- there is a reasonable suspicion and evidence that a criminal offence has been committed; in such case, Aristocrat shall immediately refer the report and all accompanying material to the Bulgarian Prosecution Office.

Upon completion of the internal investigation, Aristocrat along with the Whistleblowing Officer for Bulgaria shall prepare a report describing the information from the discloser's report, the actions taken and the outcome of the internal investigation, which shall be presented to the discloser and the person concerned.

7.0 RECORD RETENTION

All disclosures concerning Bulgaria and any related documents made through the procedures outlined in this Attachment 8 to the Global Whistleblower Policy will be retained for a period of five (5) years from completion of the internal investigation, except in cases of criminal, civil, employment and/or administrative proceedings in relation to the disclosure which may require a longer term of retention.

ATTACHMENT 9: SOUTH AFRICA

1.0 REPORTABLE CONDUCT

In addition to the Reportable Conduct defined in the Global Whistleblower Policy, Conduct included in the definition of "Disclosure" in section 1 of the Protected Disclosures Act (**PDA**) includes unfair discrimination within the meaning of the Employment Equity Act 55 of 1998 and the Promotion of Equality and Prevention of Unfair Discrimination Act 4 of 2000.

2.0 DISCLOSER'S IDENTITY

Aristocrat will comply with the Protection of Personal Information Act 4 of 2013 ("**POPIA**") in relation to the processing of personal information relating to *protected disclosures* made in South Africa.

POPIA states that the employer is not entitled to reveal personal information, save in the manner prescribed under the POPIA.

Therefore, personal information will only be disseminated or used in the following circumstances:

- (a) With the consent of the individual to whom the information belongs; or
- (b) To the extent that it is required by an obligation imposed by law.

That is, the circumstance outlined under the third dot point in section 5 of the Global Whistleblower Policy will not apply to South Africa.

Under POPIA an employee is entitled to choose to remain anonymous (including information pertaining to his or her identity). The PDA states that an employer's whistleblowing policy may not have the effect of discouraging an employee from making a disclosure. Employees should not interpret any part of the Global Whistleblower Policy as having such an effect.

3.0 RESPONSE AND INVESTIGATION

Under the PDA, any person or body to whom a *protected disclosure* is made must as soon as reasonably possible (within 21 days):

- (a) decide whether to investigate, or refer the protected disclosure to another appropriate person or body; and
- (b) acknowledge in writing receipt of the *protected disclosure* and inform the employee or worker who made the disclosure of either (i) the decision to investigate the matter and possible the timeframes for such investigation, or (ii) the decision not to investigate and the reasons for such a decision.

If the person or body to whom a protected disclosure is made is unable to make the abovementioned decisions within 21 days, they need to inform the employee or worker that they are unable to make the relevant decision within 21 days and on a regular basis (intervals of not more than two months at a time) inform them that the decision is still pending.

ATTACHMENT 10: POLAND

1.0 PROTECTION UNDER POLISH LAW

In addition to the categories of disclosers protected under the Global Whistleblower Policy, Polish law extends the whistleblower protections under the Global Whistleblower Policy to the following additional groups of disclosers: job applicants/applicants for volunteering or internship, persons who are or have been volunteers or interns or temporary agency workers.

2.0 LOCAL INTERNAL INVESTIGATIONS

In Poland, disclosures made under this Policy will be handled and investigated locally where required by law, by the local Compliance Officer or a local investigator of their choice, under principles specified in this Global Whistleblower Policy.

3.0 REPORTING DISCLOSURES TO THE AUTHORITIES

In addition to the internal independent communication channel under the Global Whistleblower Policy, protected disclosures in Poland may also be made by reporting the Reportable Conduct to public authorities, such as the Polish Ombudsman or other public authorities.

4.0 CONSULTATIONS WITH EMPLOYEE REPRESENTATIVES

The content of the Global Whistleblower Policy jointly with this Attachment 10 constitutes the local whistleblowing policy, under Article 25 of the Act of 14 June 2024 on Protection of Whistleblowers. Prior to its coming into force, from 16 September 2025 to 22 September 2025, the representatives elected by the staff have been consulted on this policy.