

# Compliance Management Framework

## NOTE:

All amendments to this Framework must be authorised by the Framework Owner and notified to the Casino Regulator within 7 days of approval.

Contact Group Compliance at [complianceseg@star.com.au](mailto:complianceseg@star.com.au) for further details

## Framework Details

### Framework Owner

Group Chief Risk Officer

### Effective Date

3 September 2024

### Last Review Date

2 September 2024

### Next Review Date

3 September 2025

### Approved by

The Star Entertainment Group Board

## Document Control

### Version

3.0

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## 01 Purpose and Scope

In delivering The Star Entertainment Group's (TSEG) purpose, to *create fun at trusted destinations*, it is important to understand and manage the legislative and regulatory requirements and obligations that arise through our operations.

The purpose of the Compliance Management Framework (CMF) is to set out TSEG's approach to the management of compliance. The CMF has been drafted to align with our Risk Management Framework (RMF) which details how we integrate risk management into significant activities and functions at TSEG.

The CMF sets out TSEG's compliance structure, policies, process and key accountabilities in alignment with our:

- Risk Management Framework (RMF),
- Purpose, Values and Principles (PVP),
- Three Lines of Accountability Model (3LOA), and
- ISO 37301:2021 Compliance Management Systems – Guidelines in Managing Compliance (ISO 37301:2021).

The Compliance Management Framework applies to all TSEG properties, Directors, Executives, Team Members and Contractors.

## 02 CMF Overview

### 2.1 Objective

2.1.1 The objective of the CMF is to:

- promote compliance with TSEG's obligations
- adopt a consistent approach to the management of TSEG's obligations
- foster an organisational culture that understands the importance of compliance
- reduce the likelihood of breaches of TSEG's compliance obligations and minimise the consequences of any breaches, and
- protect our reputation by giving stakeholders confidence that TSEG operates with integrity.

2.1.2 The CMF details the compliance management lifecycle and how obligations and risks are managed, driving adherence with legislation, regulations, policies, and Internal Control Manuals (ICMs).

### 2.2 Governance

2.2.1 TSEG maintains a formal governance structure which oversees compliance and risk management. The structure helps ensure appropriate data, analysis, information and recommendations flow to accountable individuals and forums on a timely basis to support decision making.

2.2.2 The structure consists of the Board, Board Committees, state-based Breach Assessment Committees, and Management Committees.

2.2.3 Charters or Terms of Reference document the protocols for each committee, including the role, purpose, responsibilities, decision rights and escalation process. Evidence of committee discussions and decisions is retained via minutes.

2.2.4 The oversight responsibilities of the Board and relevant committees as described in the relevant Charters and Terms of Reference are set out below:

- **Board** - oversees corporate governance practices, demonstrates leadership, defines the purpose and values and sets strategic objectives. The Board also plays an important role in overseeing management's instilling of culture and suitability to hold casino licences in New South Wales and Queensland via its purpose and values.
- **Audit Committee** - supports the Board to oversee financial reporting and the internal control framework, the external auditor and the internal audit and assurance function.
- **Safer Gambling, Governance and Ethics Committee** - supports the Board to oversee safer gambling, governance (incorporating corporate governance, environmental, sustainability and social responsibility matters) and ethics.

**Risk and Compliance Committee** - supports the Board to oversee the risk management framework and the compliance management framework and their effectiveness, assess the risk profile and set the risk appetite, and oversee the risk culture.

- **Culture, People and Remuneration Committee** - supports the Board to oversee organisational culture, people-related strategies including inclusion and diversity, talent attraction and retention, training, development and succession and the remuneration strategy and related policies.
- **Subsidiary Board Committee** - oversees the implementation of the risk and compliance management frameworks and outcomes for each of the legal entities that holds the three casino licences.
- **Property Compliance Committees** - provides independent oversight of the Property's compliance with its obligations under regulatory statutes applicable to the operation of a casino, both Commonwealth and State, in particular the Casino Control Act and Regulation and the terms of the Casino Licence.

The Committee will comprise of one independent non-executive director appointed to the Board, the Chair of the standing committee of the Board titled the Risk & Compliance Committee and two 'external' members, each of whom must be independent of the Company and The Star.

2.2.5 The Board undertakes self-assessments and reviews of the effectiveness of Board and Committee meetings, including assessing its information needs and its requirements of management for those meetings.

2.2.6 The licensed subsidiary Boards (The Star Pty Limited which holds the license for The Star Sydney, and The Star Entertainment QLD Limited (the licensee of Treasury Brisbane) and lessee of The Star Gold Coast and The Star Entertainment QLD Custodian Pty Ltd (the licensee of The Star Gold Coast) will provide close and direct supervision to the casinos they operate.

2.2.7 TSEG maintains several Management Committees that have responsibilities for the management of compliance obligations across the organisation.

2.2.8 The following list sets out a summary of the compliance management responsibilities of key management committees:

- **Group Leadership Team (GLT) Risk Committee** - escalates and reports risks and provides oversight of the Group’s compliance obligations with a focus on the key activities and decision making required to manage material and emerging risks.
- **Property Risk Committees** - Assist and advise GLT and GLT Risk Committee in the governance, optimisation, and effective management of risks and compliance at each property. This includes areas such as Financial Crime, Safer Gambling, and Health & Safety.
- **Breach Assessment Committees (BAC)** - a delegated responsibility on behalf of the BRCC to determine whether a breach has resulted in a notification requirement to the NSW or QLD Regulators under obligations set out in the relevant Casino Control Acts (CCA).
- **Property Responsible Service of Alcohol Committees** - review, escalate and monitor RSA incidents and breaches and the performance of RSA initiatives. Design and implement mitigation and control measures to deal with breaches. Review promotions involving alcohol and their impact.
- **Revocations Decision Committees previously known as Exclusions Review Committees** - support the implementation and ongoing progress of the Exclusions Policy

2.2.9 **Appendix A** sets out the key committees that report into the Board.

## 2.3 3LOA Model

2.3.1 TSEG has adopted the Three Lines of Accountability (**3LOA**) Model to support effective risk management including fulfilling compliance obligations.

2.3.2 The CMF is designed in accordance with the 3LOA to ensure that specific and distinct roles exist for managing its compliance risks and obligations and providing independent oversight over how effectively compliance risks and obligations are being managed.

Line of Accountability	Description of Accountabilities
<b>Line 1</b>	<p>Our Operating Business Units (Properties) and our Group Support Units (Corporate Functions) are accountable to Identify, assess, manage and own end-to-end risks, obligations, ICMs and SOPs relevant to the business.</p> <p>Line 1 is also accountable to identify, record and escalate issues, incidents and breaches in a timely manner; perform root-cause analysis; remediate and implement actions to prevent recurrence in a timely manner</p>
<b>Line 2</b>	<p>Group Compliance is accountable to Monitor Line 1’s compliance with obligations and ICMs.</p> <p>Group Compliance is made up of four functions, including:</p> <ul style="list-style-type: none"> <li>• Breach Management and Whistleblower Protection</li> <li>• Policy Governance and Obligations Management</li> <li>• Privacy and Information Governance</li> <li>• State-based Compliance Advisory teams</li> </ul>

Line of Accountability	Description of Accountabilities
<b>Line 3</b>	Internal Audit and Assurance is accountable provide independent risk-based assurance, including regulatory assurance over compliance with the Casino Control Act and gaming legislation

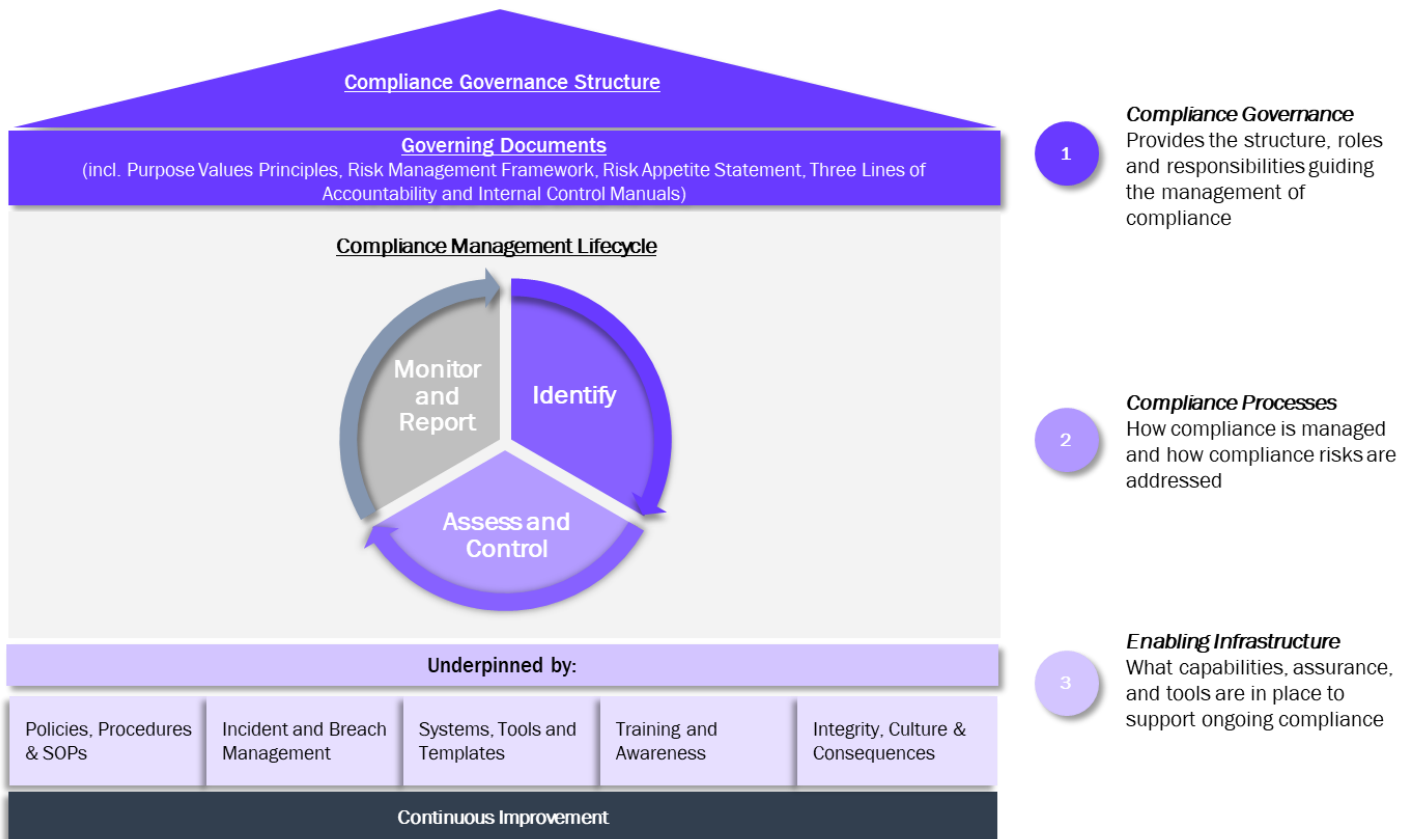
For further details, refer to the 3LOA Model available on TSEG intranet.

## 03 CMF Approach

### 3.1 CMF Components

- 3.1.1 The CMF sets TSEG’s approach to compliance obligations management which will continue to evolve in line with compliance maturity and the operating environment.
- 3.1.2 In alignment with the RMF, compliance management is a continuous lifecycle of: (1) Identify, (2) Assess and Control and (3) Monitor and Report.
- 3.1.3 TSEG’s CMF components are set out below:

**Figure 1: TSEG Compliance Management Framework**



- 3.1.4 By defining the requirements for each of the components and evaluating the effectiveness of each, TSEG can continuously improve its compliance management practices.

## 3.2 Compliance Management Lifecycle

### Identify

- 3.2.1 The first step in managing compliance is to identify all compliance obligations applicable to TSEG. This requires:
- understanding compliance obligations relevant to the business activities through the use of sources including but not limited to LexisNexis, advice and updates from external advisers (e.g., legal, tax) and information provided by regulators, and
  - ensuring that new or changes to existing compliance requirements are continually monitored in line with business and legislative changes.
- 3.2.2 Line 1 and 2 (Group Compliance) are responsible for identifying and analysing obligations across TSEG.
- 3.2.3 With the assistance of Line 2, Line 1 business units, obligation owners and obligation managers are required to identify and understand obligations applicable to their area of the business. Where a new obligation is identified by Line 1, Group Compliance should be informed as soon as possible to ensure it is properly documented.
- 3.2.4 All identified compliance obligations must be recorded in the obligations register in Protecht (TSEG's risk and compliance management system) which is managed by Line 2 Compliance team. The following details must be captured:
- Obligation Type
  - Source
  - Jurisdiction
  - Applicable Property and Department
  - Obligation owner and manager,
  - Priority rating.
- 3.2.5 Further guidance is detailed in the *Obligations Management Policy*.

### Assess and Control

- 3.2.6 Line 2 conducts an assessment to determine if an identified compliance obligation is applicable to TSEG.
- 3.2.7 If a compliance obligation is determined as applicable, the obligation manager is required to conduct a risk assessment to ensure that:
- adequate controls exist to manage the compliance obligations and ensure that the residual risk remains within appetite, or
  - a plan to manage risk is in place that aligns with the RMF.
- 3.2.8 Risk assessments and control testing are undertaken in accordance with the RMF and are also captured in Protecht.

## Monitor and Report

- 3.2.9 Obligations are regularly monitored by obligations owners and managers at a frequency depending on the priority rating that has been assigned.
- 3.2.10 Line 1 business units are to monitor for any changes to their work practices or processes which may impact what obligations are applicable to them. Line 2 are to be informed of any changes which may impact the applicability of obligations and provide support where necessary.
- 3.2.11 Line 2 are responsible for monitoring for regulatory change. Group Compliance are required to have measures in place to identify upcoming changes to existing obligations and the introduction of new obligations.
- 3.2.12 TSEG will report when it has not complied with its obligations, has identified emerging issues and breaches, systemic non-compliance, and when controls are not operating effectively and require improvement.
- 3.2.13 Obligation reporting is presented to the:
- Group Leadership Team and Property Risk Committees monthly, and
  - Board Risk and Compliance Committee quarterly.
- 3.2.14 Where there is an instance of non-conformance with an obligation, an incident or breach should be raised in line with the *Incident and Breach Management Policy*.
- Note, full obligation reporting to commence in the second half of 2024 following implementation of Protecht.
- 3.2.15 The reporting is intended to:
- provide a holistic overview of TSEG's adequacy and effectiveness of internal controls, compliance with laws and regulations, incidents and breaches, regulatory change, and timely remediation of deficiencies,
  - outline potential changes in compliance obligations together with the impact to TSEG and proposed course of action, and
  - provide information about progress in developing and implementing measures to reduce risk where it is considered necessary or appropriate.
- 3.2.16 TSEG also has various external compliance reporting obligations including to:
- the New South Wales Independent Casino Commission
  - Liquor and Gaming New South Wales
  - the Queensland Office of Liquor and Gaming Regulation
  - AUSTRAC, and
  - other ad hoc regulator requests.
- 3.2.17 The process of external reporting should be subject to suitable processes and controls, governance, and oversight, and the second line compliance function should be made aware of it.



## 3.3 Enabling Infrastructure

### Policies, Procedures, ICMs & SOPs

- 3.3.1 Underpinning TSEG compliance environment is a suite of Frameworks, Policies, Procedures, Internal Control Manuals (ICM) and Standard Operating Procedures (SOP).
- 3.3.2 TSEG policies have been developed to protect our guests, people, investors and community as well as meet legal, regulatory and internal requirements, including the Casino Control Acts. They are approved by the Board, Board Committee or Senior Management.
- 3.3.3 Policies and Frameworks support decision-making and articulate how we meet our obligations and manage risks.
- 3.3.4 ICMs set regulatory expectations of how we keep ourselves and our guests safe and govern the way we work. They are set by our regulators, Liquor and Gaming (L&G) in New South Wales and the Office of Liquor, Gaming and Racing (OLGR) in Queensland.
- 3.3.5 Standard Operating Procedures (SOPs) provide specific rules, expectations or criteria that must be met to comply with an ICM. Most ICMs are transposed into a dedicated SOP which also incorporates TSEG minimum requirements.
- 3.3.6 Further guidance is detailed in the *Policy Development and Maintenance Framework*.

### Incident and Breach Management

- 3.3.7 TSEG requires all Team Members identify and action those incidents and breaches of its obligations that have occurred.
- 3.3.8 The Breach Assessment Committee assesses and confirms which breaches and likely breaches are reported to the regulator, confirms materiality ratings of breaches and escalates breaches to management and Board.
- 3.3.9 Group Compliance manage the Breach Assessment Committee, provide oversight over remediation and submit breach reports to the relevant regulatory body. A breach report must be reported within the following timeframes:
  - New South Wales: as soon as practicable but not later than 5 calendar days after TSEG becomes aware of a breach or likely breach
  - Queensland: as soon as practicable but not later than 5 business days after TSEG forms the belief that a breach has occurred.
- 3.3.10 Further guidance is detailed in the *Incident and Breach Management Policy*.

### Systems, Tools & Templates

- 3.3.11 TSEG's risk and compliance management processes are supported by Protecht as the main repository and system of record for risk and compliance data, analysis, and reporting.
- 3.3.12 Risk and compliance data is collected and monitored in Protecht including:
  - Outcomes of risk assessments;
  - Outcomes of obligation assessments;
  - Outcomes of control self-assessments;
  - Incidents and breaches;

- Risk Actions (including agreed actions from Internal and External Audit reviews); and
- Compliance Attestations.

3.3.13 Group Compliance maintains a number of registers, documents and templates to assist in compliance management, including:

- Breaches Register
- Conflicts of Interest Register
- Gifts Register
- Obligations Register
- Policy and Procedure templates
- Privacy Complaints Register
- Privacy Incidents Register
- Whistleblower Register

3.3.14 ServiceNow is used for the submission of:

- Policy or SOP updates, creation, or archiving, and
- Compliance Assessments for Product changes or introductions.

## Training and Awareness

3.3.15 Awareness of the CMF and related documents across TSEG is supported by:

- materials being made available on the Intranet for all Team Members and Contractors, and
- tone from the top demonstrated by the actions and communication of the Group Leadership Team.

3.3.16 TSEG is committed to providing appropriate support and training to team members to ensure they are competent to fulfil their roles in a manner that is consistent with its organisational culture and commitment to compliance.

3.3.17 All new team members must complete induction training that covers essential areas to ensure they understand their compliance responsibilities and how TSEG's CMF functions.

3.3.18 Furthermore, team members are required to undergo refresher training on a regular basis in accordance with regulatory requirements, and additionally in areas where compliance obligations, legislative requirements and any high-risk topics have undergone changes.

3.3.19 Team Members must complete all mandatory training, for which attendance will be recorded. For further details refer to *Training and Competency Policy*.

## Integrity, Culture & Consequences

3.3.20 TSEG is committed to developing, maintaining, and promoting a strong compliance culture at all levels throughout the Group, that adheres with its PVP and Code of Conduct.

3.3.21 TSEG's commitment to a culture of compliance includes:

- to promote and encourage team members to report compliance issues and breaches.
- to ensure ongoing compliance training, including updates to the training to all team members and relevant interested parties,
- to monitoring and reviewing noncompliance issues,

- Understanding root causes and taking corrective actions where required and
- open and appropriate communication about compliance.

## Continuous Improvement

3.3.22 TSEG will continually monitor the suitability, adequacy, and effectiveness of its CMF. The CMF will be reviewed and will be updated as required to ensure:

- adequacy of the Framework is appropriate to TSEG,
- changes in regulatory requirements and other external expectations,
- any non-compliance issues are addressed, and
- all new and updated compliance obligations have been captured in the obligations register.

3.3.23 The CMF will be reviewed by Group Compliance every two years, or more frequently where required by material regulatory, business or strategy change and any changes identified by the Group Chief Risk Officer.

3.3.24 The Board oversees TSEG’s compliance with relevant obligations, and reviews and endorses the CMF.

3.3.25 The BRCC recommends any changes to the CMF to the Board and monitors the ongoing effectiveness of the CMF and implementation of actions to remediate any material breach of a compliance obligation.

3.3.26 When required, the Third Line will be engaged to support TSEG in conducting assurance over its compliance practices.

3.3.27 As part of its responsibility for providing independent assurance and advice on the effectiveness of risk management, controls and governance processes, Line 3 will conduct audits and reviews of compliance practices. These include a program of continuous testing of obligations in the NSW and Queensland Casino Control Acts and Regulations.

## 04 Roles and Responsibilities

Line of Accountability	Role	Responsibilities
Oversight	Board	<ul style="list-style-type: none"> <li>• Overseeing compliance with relevant obligations.</li> <li>• Reviewing and endorsing the Compliance Management Framework.</li> </ul>
	Board Risk & Regulatory Performance Committee	<ul style="list-style-type: none"> <li>• Recommending to the Board any changes to the Compliance Framework.</li> <li>• Monitoring the ongoing effectiveness of TSEG’s compliance management framework.</li> <li>• Monitoring the implementation of actions to remediate any material breach of a compliance obligation.</li> </ul>

Line of Accountability	Role	Responsibilities
<b>Line 1</b>	Executive Management	<ul style="list-style-type: none"> <li>• Establish a strong set of compliance values which are well embedded in TSEG culture.</li> <li>• Establish, support, and promote continual improvement of the compliance management system.</li> <li>• Actively communicate the importance of an effective compliance management system.</li> <li>• Ensure that the commitment to compliance is maintained and that non-compliance and non-compliant behaviours are dealt with appropriately.</li> <li>• Allocate adequate and appropriate resources to implement, evaluate, maintain, and improve the compliance management system and performance outcomes.</li> <li>• Ensure that the responsibilities and authorities for relevant compliance roles are assigned and communicated.</li> <li>• Ensure that effective and timely compliance reporting is in place.</li> <li>• Be measured against key compliance performance measures and outcomes.</li> </ul>
	Compliance Obligation Owners	<ul style="list-style-type: none"> <li>• Identifying obligations related to their business unit.</li> <li>• Hold primary responsibility for specific obligation.</li> <li>• Ensure obligations are understood, properly managed and complied with.</li> <li>• Assign resources to ensure obligations are properly managed, including Obligation Manager.</li> <li>• Complete attestations for applicable obligations.</li> </ul>
	Operational Management	<ul style="list-style-type: none"> <li>• Operate within the approved business and compliance strategies, compliance objectives, Compliance Framework and TSEG's policies.</li> <li>• Develop and implement effective processes and controls that ensure compliance obligations and risk are appropriately identified, assessed, managed, and communicated.</li> <li>• Ensure controls are adequately maintained, monitored, and assessed to negate against compliance issues and incidents.</li> <li>• Cooperate with and support the compliance function and encourage team members to do the same.</li> <li>• Develop team members awareness of compliance obligations and support compliance training activities and direct team members to meet training and competence requirements.</li> <li>• Promote a culture where team members are encouraged, supported, and empowered to raise compliance issues, incidents and breaches.</li> <li>• Support the timely resolution of compliance issues and incidents through the provision of adequate resources.</li> </ul>

Line of Accountability	Role	Responsibilities
		<ul style="list-style-type: none"> <li>• Govern and report on the implementation of robust and sustainable corrective actions and improvements.</li> </ul>
	All Team Members	<ul style="list-style-type: none"> <li>• Undertake their duties in a manner that promotes compliance and adheres with compliance obligations and TSEG's policies.</li> <li>• Satisfactorily completing mandatory training in a timely manner when required.</li> <li>• Escalate compliance concerns or questions to the relevant Group Compliance function or <a href="mailto:ComplianceSEG@Star.com.au">ComplianceSEG@Star.com.au</a>.</li> </ul>
<b>Line 2</b>	Breach Management Team	<ul style="list-style-type: none"> <li>• Develop, maintain, and promote policies and procedures for the management of breaches and the identification of relevant compliance obligations.</li> <li>• Management of breaches throughout the breach lifecycle and ensuring that relevant business units are involved in the process.</li> <li>• Ensure timely and accurate reporting to regulators as required.</li> <li>• Conduct analysis and providing reports / insights into breach trends</li> </ul>
	Whistleblower Protection	<ul style="list-style-type: none"> <li>• Develop, maintain, and promote policies and procedures for the management of whistleblower protection and reporting.</li> <li>• Monitor whistleblower reporting channels. Review, assess and triage matters.</li> <li>• Continual engagement with the Whistleblower throughout the process, providing updates and outcomes.</li> <li>• Ensuring that Whistleblowers are provided their statutory protections under the Corporations Act.</li> <li>• Review, investigate and manage whistleblower reports</li> <li>• Facilitate end-to-end investigation process and produce findings.</li> <li>• Escalate matters of significance to the CEO, Safer Gambling, Governance and Ethics (SGGE) Committee (a sub-committee of The Board) and Manager / Special Manager as required.</li> <li>• Conduct analysis and produce meaningful reports to the SGGE Committee.</li> </ul>
	Policy Governance Team	<ul style="list-style-type: none"> <li>• Develop, maintain, and promote policies and procedures for management of policies and other documents and the identification of relevant compliance obligations.</li> <li>• Develop, review, update or assist in the review of TSEG's policies and procedures, ensuring alignment with regulatory requirements and industry standards.</li> <li>• Facilitate the dissemination of policies and procedures across TSEG.</li> </ul>

Line of Accountability	Role	Responsibilities
		<ul style="list-style-type: none"> <li>• Monitor compliance with policy and procedure governance, enforcing adherence through regular assessments and reviews.</li> <li>• Implement corrective actions as necessary to address non-compliance issues and mitigate compliance risks.</li> </ul>
	Privacy Team	<ul style="list-style-type: none"> <li>• Develop, maintain, and promote policies and procedures for management of privacy and the identification of relevant compliance obligations.</li> <li>• Conduct Privacy Impact assessments to evaluate the potential privacy risks associated with new products, systems, or processes that involve the collection, use or disclosure of personal information.</li> <li>• Identify and support the implementation of measures to mitigate identified risks and safeguard individual's privacy.</li> <li>• Establish and manage processes for the handling of individuals requesting access to the personal information that TSEG holds on them.</li> <li>• Develop and deliver privacy training programs to educate Team Members on their responsibilities regarding privacy.</li> <li>• Establish procedures for responding to privacy incidents, including supporting the response to data breaches and unauthorised disclosures of personal information.</li> </ul>
	Obligations Management Team	<ul style="list-style-type: none"> <li>• Develop, maintain, and promote policies and procedures for management of obligations and the identification of relevant compliance obligations.</li> <li>• Continuously monitor changes in relevant legislation, regulations and industry standards to identify new obligations and ensure ongoing compliance with requirements.</li> <li>• Provide oversight and support to Line 1 in the management of obligations.</li> <li>• Maintain and update the Obligations Register.</li> <li>• Develop and implement action plans to address gaps in compliance with regulatory obligations.</li> </ul>
	State-based Compliance Advisory Teams	<ul style="list-style-type: none"> <li>• Responsible for overseeing compliance with regulations and policies.</li> <li>• Conduct compliance / risk assessments specific to property-related compliance, identifying potential risks and vulnerabilities within the properties.</li> <li>• Develop and implement risk mitigation strategies to minimise exposure to compliance-related risks.</li> <li>• Ensure that vendors and contractors engaged in property-related activities comply with relevant regulations and contractual requirements.</li> <li>• Promote awareness and understanding of compliance requirements to foster a culture of compliance within the</li> </ul>

Line of Accountability	Role	Responsibilities
		business units.
	All Compliance Team Members	<ul style="list-style-type: none"> <li>• Identify opportunities for enhancing compliance processes and procedures throughout the business.</li> <li>• Collaborate with cross-function teams to implement process improvements, leverage technology solutions, and streamline compliance efforts to achieve greater effectiveness.</li> <li>• Supporting management policies, defining roles and responsibilities, and setting goals for implementation.</li> <li>•</li> </ul>
<b>Line 3</b>	Internal Audit	<ul style="list-style-type: none"> <li>• Conduct independent and objective assurance of the application of the Compliance Management Framework and controls as executed by Line 1 and Line 2.</li> </ul>

## **05 Breaches of the Framework**

TSEG is committed to conducting its operations in a way that meets its commitments to regulators, guests, and the wider community. Non-conformance with a framework or policy, including the CMF, can pose a significant risk to TSEG, guests, and the wider community, potentially resulting in punitive measures against TSEG.

Non-conformance with the CMF may amount to a breach of TSEG’s Code of Conduct and values. Breaches of the Code of Conduct may result in disciplinary action, including termination of employment, fines, penalties, and potential prosecution.

## 06 Definitions

Term	Definition
<b>Breach</b>	Arises when there is a failure to comply with relevant legislation, regulation, licensing or commercial agreement applicable to TSEG.
<b>Group Compliance Function</b>	A second Line of Accountability function within TSEG which specialises in processes that are subject to compliance, regulatory or legislative obligations.
<b>Compliance Obligations</b>	Requirements and commitments that arise from both external sources (e.g., legislation, industry codes and standards) and internal sources (e.g., Internal Control Manuals (ICMs), TSEG policies and standards)
<b>Contractor</b>	Means one of the following: <ul style="list-style-type: none"> <li>• Independent contractors: self-employed individuals or are part of a proprietary company (ABN) usually engaged for project work and paid for results achieved.</li> <li>• Contingent workers: individuals engaged to ensure coverage or support for TSEG roles. For example, a contingent worker is in a role that is vacant, whilst the position is being recruited.</li> <li>• Consultants: individuals engaged to deliver set outcomes, provide advice or recommendations, and are usually paid on completion of milestones or deliverables. Procurement is to be engaged when considering using consultants to agree the terms and conditions with TSEG.</li> </ul>
<b>Control</b>	Any recurring action or mechanism which either reduces the likelihood of a risk event occurring, reduces the potential impact arising from the occurrence of a risk event, or transfers some or all of the consequences should an event occur.
<b>Incident</b>	Any event, nonconformance or non-compliance which deviates from a standard process, expected outcome, illegal or undesirable conduct or involves a reduction in safety to either guests or team members.
<b>Obligation</b>	A legal, regulatory, contractual, or ethical responsibility that TSEG is required to fulfil.
<b>Risk Appetite</b>	Defines the amount of risk TSEG is willing to accept in pursuit of its strategic objectives and is documented in the Risk Appetite Statement (RAS).
<b>Team Member</b>	Means full-time, part-time and casual employee of TSEG
<b>The Board</b>	TSEG's Board of Directors
<b>TSEG</b>	The Star Entertainment Group



## 07 Related Policies and Documentation

The following policies and documentation related to this policy can be found on TSEG's intranet site:

- 3LOA Model
- Code of Conduct
- Controls Management Policy
- Incident and Breach Management Policy
- Obligations Management Policy
- Policy Development and Maintenance Framework
- Privacy Compliance Policy
- Privacy Management Framework
- Risk Appetite Statement
- Risk Management Framework
- Training and Competency Policy

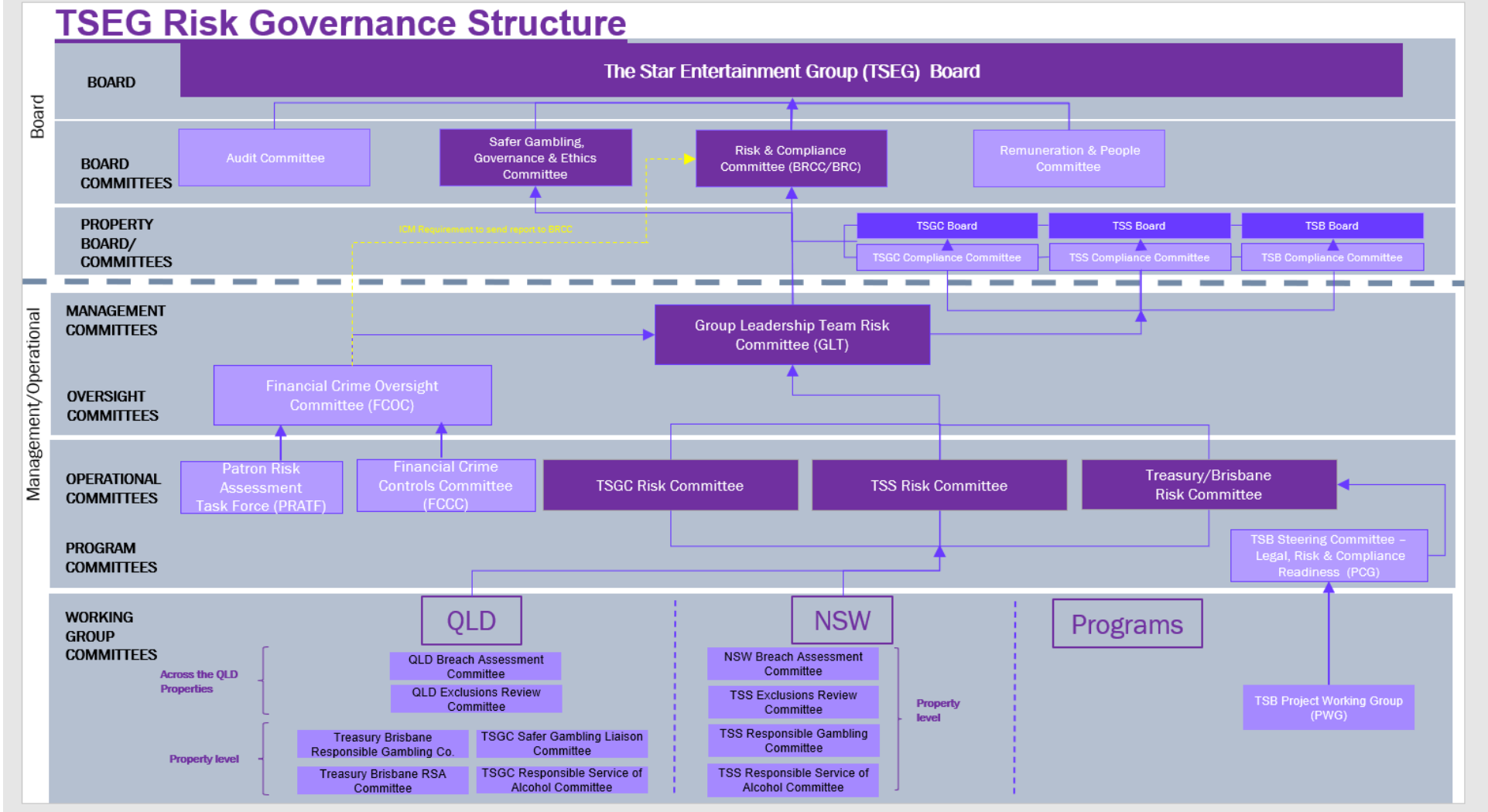
## 08 Feedback and Questions

Please contact the Group Compliance Team for any questions relating to this policy.

Version	Amended by	Reason for change	Details of changes	Date
1.0	-	Framework document created	Framework document created	1 February 2021
2.0	Group Compliance		<p>Removal of Compliance Policy from Compliance Management Framework.</p> <p>Aligning requirements with current practice and simplifying format for ease of reference and understanding.</p>	1 July 2023
3.0	Group Compliance	Framework uplifted as part of Remediation Plan	Existing Framework transferred to new policy template and updated to align with RMF, 3 LoA model, PVP and industry practice.	2 September 2024

# Appendix A. Reporting Lines to The Board

Figure 1. Committees with a reporting line to The Star Entertainment Group Board



## Appendix B 3LOA

