

# The Star Entertainment Group

## Supplier Code of Conduct

The Star Entertainment Group (TSEG) is committed to responsible procurement practices that demonstrate integrity, sustainability, and ethical business conduct.

We recognise that our suppliers play a crucial role in our ability to deliver high-quality products and services while upholding our commitment to social and environmental responsibility.

We challenge our suppliers to innovate and look for opportunities to continuously improve business practices. We welcome collaboration and partnership, and we ask our suppliers to present opportunities to enhance our sustainability performance, product selection and supply chain management.

We expect our suppliers to adhere to The Star's Supplier Code of Conduct, and to work with their suppliers to do the same.

### **Our North Star: A Sustainable Future for All**

At The Star, we're guided by a clear vision: our Strategic North Star. It outlines our commitment to creating sustainable outcomes – for our guests, team members, communities, and stakeholders, not just for profit. We achieve this by providing safe, responsible, and ethical entertainment, gaming, and leisure experiences. This North Star ensures everyone is aligned and focused on achieving the same goals, particularly as we navigate the path towards suitability.

### **Creating Trusted Fun Through Supplier Partnerships**

Our Purpose, "Create Fun at Trusted Destinations," captures the essence of who we are. We bring joy, but we also recognise the importance of trust. We build trust with our team members, guests, and communities by upholding the highest ethical standards.

### **Our Values**

Our values serve as the compass guiding our actions and are integral to shaping our culture and driving our success. When our suppliers share our Values, we can create a better experience for our team members, guests, and, ultimately, the communities we serve.

**"Building Memorable Connections"** reminds us that relationships and fun are at the heart of who we are. We work together to create the best experience for anyone.

**"Own it"** recognises that every person plays a unique role in making The Star shine. We take responsibility and help each other grow.

**"Leading with integrity"** means that we are honest and ethical, we speak up and follow through to make sure the right thing is being done.

**"Taking Good Care"** reflects that the wellbeing and safety of our team, guests and communities is deeply important to us. We protect, support, and positively contribute to our communities.

## Ethical Business Conduct

### Legal Compliance and Ethical Business Practices

Suppliers must comply with all applicable laws, regulations, and standards in the jurisdictions where they operate. This includes but is not limited to labour laws, privacy laws, environmental regulations, health and safety standards, and anti-corruption laws.

Suppliers must conduct their business with honesty, integrity, and transparency. They must implement policies and processes to prohibit bribery, corruption, extortion, and any other unethical business practices.

We expect that suppliers proactively develop adequate policies and procedures to prevent bribery in all commercial dealings and foster a culture of transparency that allows all stakeholders to speak out about corruption in all forms.

The Star's team members act in accordance with a Gifts Policy that promotes a culture of acting honestly and with integrity. Team members and suppliers must ensure that any gift does not compromise, and would not objectively be viewed as compromising, the employee's independence and judgment in connection with any decision affecting our business relationship with the giver of the gift.

We require suppliers to ensure that their own suppliers and subcontractors also adhere to ethical and responsible business practices consistent with The Star Supplier Code of Conduct.

### Confidentiality and Intellectual property

Suppliers must respect the confidentiality of The Star's proprietary information and intellectual property rights and take appropriate measures to protect them from unauthorised disclosure or use.

We expect that our suppliers will protect our privacy rights by making sure that our personal information is properly collected, stored, used and disposed, and provide training for all employees on the importance of privacy and how to conform with privacy laws.

We require that suppliers do not disclose any information which is confidential in its nature to anyone apart from its intended recipient.

For further information regarding how we treat your information, please refer to our [Privacy Policy](#).

### Cyber Security & Privacy

We require all suppliers to implement robust cybersecurity measures to safeguard against cyber threats and breaches, particularly when suppliers collect and handle personal information on our behalf. This includes but is not limited to, regular security assessments, encryption of sensitive data, employee cybersecurity & privacy training, and adherence to privacy laws and industry best practices.

Suppliers are expected to promptly report any data breach incidents or security vulnerabilities to The Star and work collaboratively with us to mitigate risks and enhance security protocols.

We expect that suppliers will demonstrate their commitment to maintaining the integrity, confidentiality, and availability of our shared digital ecosystem.

### Supporting communities

The Star supports and participates in the communities in which we operate, partnering with charities, community groups and sporting organisations in each of our precincts. We encourage our suppliers to support their local communities and implement philanthropic practices within their organisation and we look to partner with suppliers who implement these practices.

## Supporting and Protecting Human Rights

### Labour Practices and Modern Slavery

Suppliers must conduct their business activities in a manner that protects the fundamental human rights set out in the [UN Declaration of Human Rights](#) and ensure they are not complicit in any human rights abuses.

Suppliers must treat their employees with dignity and respect, including providing fair wages, safe working conditions and reasonable working hours. Also to allow all workers the right to freedom of association and the effective recognition of the right to collective bargaining.

As part of our obligations under the Modern Slavery Act 2018 (Cth), we require our suppliers to diligently identify, evaluate, and mitigate the risks associated with modern slavery within their operations and supply chains.

Labour exploitation and modern slavery practices are prohibited, including trafficking, slavery, forced labour, and child labour and The Star reserves the right to audit any supplier we suspect may be engaging in, or supporting these activities.

If at any time a supplier becomes aware of modern slavery practices in its operations or supply chains, the supplier must as soon as reasonably practicable:

- a) take all reasonable action to address or remove these practices, including where relevant by addressing any practices of other entities in its supply chains; and
- b) take all reasonable steps to remediate any adverse impacts caused or contributed to by the Supplier from these practices in accordance with the [Guiding Principles on Business and Human Rights](#).

### Non-Discrimination and supplier diversity

At The Star, we deeply value supplier diversity and inclusive practices as an integral part of our business ethos. We are committed to fostering an inclusive and equitable environment by partnering with a diverse range of suppliers.

Suppliers must provide equal employment opportunities to all individuals regardless of race, colour, religion, gender and sexual orientation, age, disability, nationality, or any other characteristic protected by law.

We hold our suppliers to high standards. We expect them to actively strive to eliminate any form of discrimination and to ensure fair employment practices for all staff members. This commitment aligns with our values of equality, diversity, and inclusivity and is a fundamental requirement in our partnerships with suppliers.

Suppliers must ensure that all staff can work free from discrimination, bullying, and sexual harassment. The Star may ask suppliers to provide evidence of inclusive practices, including LGBTQI+, trans, and gender-diverse inclusive practices and policies.

### Reconciliation

We actively seek to engage with suppliers from a wide range of backgrounds and communities, including Aboriginal and Torres Strait Islander communities. We recognise the importance of reconciliation and supporting Indigenous businesses as part of our broader commitment to social responsibility.

When engaging with Indigenous suppliers, we aim to engage genuine Indigenous businesses that are 51% or more Aboriginal and/or Torres Strait Islander-owned, managed, and controlled. This is to support opportunities for economic advancement and empowerment for Indigenous businesses. Through our Supply Nation membership, we further aim to ensure we support the Indigenous economy, and grassroots Indigenous-owned businesses to ensure best practice in First Nations business engagement.

If there are concerns about a supplier engaging in the malpractice known as “black cladding”, we will discontinue our involvement with them and will notify Supply Nation. "Black cladding" refers to the unethical practice where a non-Indigenous business or individual exploits an Indigenous business or individual to gain access to Indigenous procurement policies or contracts that they would not typically have access to.

## **Health and Safety**

Suppliers must prioritize the health and safety of their employees, customers, and the communities in which they operate. This includes providing a safe working environment, conducting regular safety assessments, and implementing appropriate safety measures and training programs to ensure a safe working environment and adhere to the Work Health and Safety Act 2011

They must implement measures to prevent accidents, injuries, and work-related illnesses, and provide health and safety information, instruction, training or supervision where required.

Where incidents do occur, suppliers must ensure they are responded to, and appropriately investigated in a timely and effective manner. Compliance with the Australian Standards for Occupational Health and Safety Management is expected.

## **Environmental Responsibility**

### **Sustainable Practices and Regulatory Compliance**

Suppliers must minimise their environmental impact by implementing sustainable practices to reduce energy consumption, conserve water, minimise waste, and responsibly manage hazardous materials.

Suppliers must comply with the Environmental Protection and Biodiversity Conservation Act 1999 and other relevant environmental laws, and must obtain and maintain all necessary environmental permits.

### **Climate Change**

Suppliers are encouraged to proactively address risks and opportunities related to climate change. This entails conducting risk assessments to identify vulnerabilities in supply chains and operations, while also implementing resilience measures such as diversifying sourcing locations and adopting renewable energy sources.

It is required that suppliers comply with mandatory climate related financial disclosures reporting when Australian Sustainability Reporting Standards (ASRS) are introduced in, or consider

voluntary reporting in accordance with the Task Force on Climate-related Financial Disclosures (TCFD).

## **Carbon Footprint Reduction**

The Star is committed to contributing to a low carbon economy and reducing our Scope 1, 2 and 3 emissions.

We encourage our suppliers to develop carbon reduction plans and roadmaps to implement initiatives to reduce carbon emissions, including the adoption of energy-efficient practices and technologies. This may include net zero or carbon neutral targets, or becoming Climate Active certified.

## **Packaging, Waste and Circularity**

The Star is a member of the Australian Packaging Covenant Organisation (APCO). We expect our suppliers to conform to APCO guidelines, and contribute to achieving APCO 2025 Targets:

- 100% reusable, recyclable or compostable packaging.
- 70% of plastic packaging being recycled or composted.
- 50% of average recycled content included in packaging (revised from 30% in 2020).
- The phase out of problematic and unnecessary single-use plastics packaging.

Suppliers must aim for a reduction of packaging waste through innovative design, with a focus on reducing materials, recyclability and biodegradability.

We encourage suppliers to implement waste management plans that prioritise preventative measures, reuse, recycle, and recover. We also encourage suppliers to implement reduction strategies and collaborate with waste disposal partners and other stakeholders to achieve circular economy principles and improved diversion from landfill rates.

## **Nature and Biodiversity**

Suppliers are encouraged to support The Star's commitment to nature and biodiversity by implementing practices that avoid raw material sourcing practices which contribute to deforestation or habitat destruction.

It is advised that suppliers adopt recommendations by the Taskforce on Nature-related Financial Disclosures (TNFD) by integrating nature-related considerations into their operational frameworks and reporting mechanisms. This involves conducting assessments to identify and evaluate the impacts of their operations on biodiversity and ecosystem services.

Suppliers should strive to implement strategies that mitigate negative impacts on nature while capitalizing on opportunities that arise from sustainable practices.

We encourage a commitment to biodiversity conservation through sustainable land use and supply chain practices.

## **Water Management**

Suppliers are encouraged to implement responsible water use practices, conforming to guidelines set by the National Water Initiative and other relevant legislation. This includes implementing water conservation measures in water-scarce regions.

## **Sustainable Design and Operational Standards**

The Star's Sustainable Design and Operational Standards provides a framework for our Property Development and Operations teams, suppliers, contractors and sub-contractors throughout the design, retrofit, construction, restoration, and operational phases of projects.

Suppliers who are involved in property development and operations are required to comply with The Star's Sustainable Design and Operational Standards which are available on The Star's website at [Supplier Policies and Procedures – The Star Entertainment Group](#)

### **Continuous Improvement:**

Suppliers are expected to continuously monitor and improve their social, environmental, and ethical performance, and collaborate with The Star to identify opportunities for enhancement.

Failure to comply with this Supplier Code of Conduct may result in corrective action, up to and including termination of the supplier relationship.




### **Reporting and Compliance**

Suppliers are encouraged to promptly report any violations of this code of conduct or any concerns about ethical, social, or environmental practices within their organisation.

The Star is committed to supporting all workers in our operations and supply chain to raise concerns or issues that are related to our Supplier Code of Conduct. We provide a confidential and independent reporting service that supports our team members, suppliers and their employees to raise concerns anonymously and securely, and in multiple languages.

Reports are received by Nominated Disclosure Officers at The Star who will assess and investigate the matter, according to The Star's Whistleblower Protection Policy.

To raise your concern confidentially using The Star's Whistleblower Service, please see the options, below and refer to [The Star Whistleblower Protection Policy](#).

Reporting Channel	How to use the Reporting Channel
	<p>Call the secure external hotline – Your Call.</p> <p>You can make a report via telephone to the external Whistleblowing Hotline service operated by Your Call:</p> <p><b>1800 319 826 (7:00am to midnight AEST on business days).</b></p> <p>You may elect to remain anonymous or choose to share your contact details with The Star.</p>
	<p>Report securely online – Rely platform.</p> <p>You can make a report to our online reporting portal at any time via:</p> <p><a href="http://star.relyplatform.com/report">star.relyplatform.com/report</a></p> <p>You may elect to remain anonymous or choose to share your contact details with The Star.</p>
	<p>Report to an internal Eligible Recipient.</p> <p>You have the option to report to the following individuals authorised by The Star under the Corporations Act to receive reports:</p> <ol style="list-style-type: none"> <li>1. <a href="#">Whistleblower Protection Officer.</a></li> <li>2. Any Director, Secretary, the Group Chief Executive Officer, a member of the Group Leadership Team, a "General Manager" or another senior manager of The Star.</li> <li>3. An actuary, auditor or member of an audit team conducting an audit of The Star.</li> </ol>

## More information

For information including how to deliver to us and other policies and documentation, go to The Star's website: [Suppliers – The Star Entertainment Group](#)

## Registered Office:

Level 3, 159 William Street, Brisbane QLD 4000

## Property Locations:

### The Star Sydney

80 Pyrmont Street, Pyrmont New South Wales 2009

### The Star Gold Coast

8 Casino Drive, Broadbeach Queensland 4218

### Treasury Brisbane

130 William Street, Brisbane Queensland 4001

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