

2024 MODERN SLAVERY STATEMENT

The Star Entertainment Group

ABOUT THIS STATEMENT

This statement, pursuant to the Australian Modern Slavery Act 2018 (Cth) (**Act**), contains the activities undertaken by The Star Entertainment Group Limited (“The Star”) ABN 85 149 629 023 to understand and address modern slavery risks in our business, operations, and supply chain for the financial year 1 July 2023 to 30 June 2024. This statement covers The Star as a single reporting entity. It has been approved by the Board of Directors and has been signed by the CEO and Managing Director.

The Star acknowledges the Traditional Owners of the land where our properties are situated. This includes the Turrbal and Jagera people of the Brisbane region, the Yugambeh language people of the Gold Coast, and the Gadigal people of the Eora Nation in Pyrmont. We pay our respects to Elders past and present.

OUR COMMITMENT

At The Star, we are committed to upholding human rights across our operations and supply chain, recognising the severe impact of modern slavery. In line with the UN Guiding Principles on Business and Human Rights, we work with our team members, suppliers, and partners to implement transparent and responsible practices.

Our due diligence process and risk management framework help us prioritize worker safety and dignity by identifying and managing risks effectively, and we support our team members and suppliers to learn more about modern slavery through on-going training and education.

We believe that a commitment to human rights is not only the right thing to do but also essential for building a sustainable and responsible business. We will continue to prioritise this commitment and work towards creating a better future for all.

Sincerely



Neale O'Connell

Acting Group Executive Officer

and Interim Group Chief Financial Officer



Anne Ward

Chairman

Contents

ABOUT THIS STATEMENT	1
OUR COMMITMENT	2
INTRODUCTION	4
Criterion 1: REPORTING ENTITY - THE STAR ENTERTAINMENT GROUP	5
Criterion 2: OPERATIONS AND SUPPLY CHAIN	7
Criterion 3: RISKS OF MODERN SLAVERY	9
Criterion 4: ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS	13
Criterion 5: TRACKING EFFECTIVENESS	20
Criterion 6: CONSULTATION WITH ENTITIES OWNED OR CONTROLLED	21
Criterion 7: OTHER RELEVANT INFORMATION	21

INTRODUCTION

The term “modern slavery” is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedoms. The Act defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.

Modern slavery is a large and complex problem that affects millions of people worldwide. The Global Slavery Index 2023 indicate there are 50 million people living in situations of modern slavery on any given day, either forced to work against their will or in a marriage that they were forced into. Forced labour accounts for 28 million of those in modern slavery and forced marriage for 22 million, or nearly one of every 150 people in the world.

Unfortunately, it is a situation that is getting worse. The data for 2023 reveals an increase of approximately 10 million more men, women, and children who have been forced to work or marry since the last estimates were published in 2018.

Australia is also exposed to the risk of modern slavery through the products it imports. According to the Global Slavery Index, the top 5 products at risk of modern slavery through imports are electronics, garments, solar panels, textiles, and fish.

Product at risk of modern slavery	Import value (in billions of \$US)	Source Countries
Electronics	8.9	China, Malaysia
Garments	6.4	Argentina, Bangladesh, Brazil, China, India, Malaysia
Solar Panels	1.3	China
Textiles	0.5	China
Fish	0.4	China, Ghana, Indonesia, Taiwan, Thailand

Source: Global Slavery Index: Country Study Australia

As one of Australia’s largest single site employers and a major hospitality and entertainment provider, The Star strives to protect and support the rights and freedoms of our customers, employees and those employed by our suppliers.

We expect and require our suppliers to understand these commitments, and to accept the conditions in our Supplier Code of Conduct.

The Star has developed its approach to modern slavery based on the United Nations “Protect, Respect and Remedy” Framework, and as participants of the UN Global Compact we report annually our Communication of Progress towards the 10 United Nations Ten Principles and the Sustainable Development Goals.

The Star’s Modern Slavery Statement refers directly to the mandatory reporting criterion detailed in the Act.

Criterion 1: REPORTING ENTITY - THE STAR ENTERTAINMENT GROUP

The Star Entertainment Group Limited is Australia's largest listed casino entity, operating landmark venues in Sydney, Brisbane and the Gold Coast. The Star also manages the Gold Coast Convention and Exhibition Centre on behalf of the Queensland Government.

The Star Entertainment Group and its joint venture partners Chow Tai Fook Enterprises and Far East Consortium are developing the \$3.6 billion Queen's Wharf Brisbane precinct. In August 2024, a staged opening commenced. Queen's Wharf and The Star Brisbane will deliver transformational impacts on Queensland jobs, training, and tourism, both domestic and international.

Structure

Please refer to the most recent Annual Report which can be found at: starentertainmentgroup.com.au/annual-reports

Our transformation

As part of our work to transform our organisation and return to suitability, we remain committed to delivering a range of improved outcomes for our teams, guests and the communities of Queensland and New South Wales.

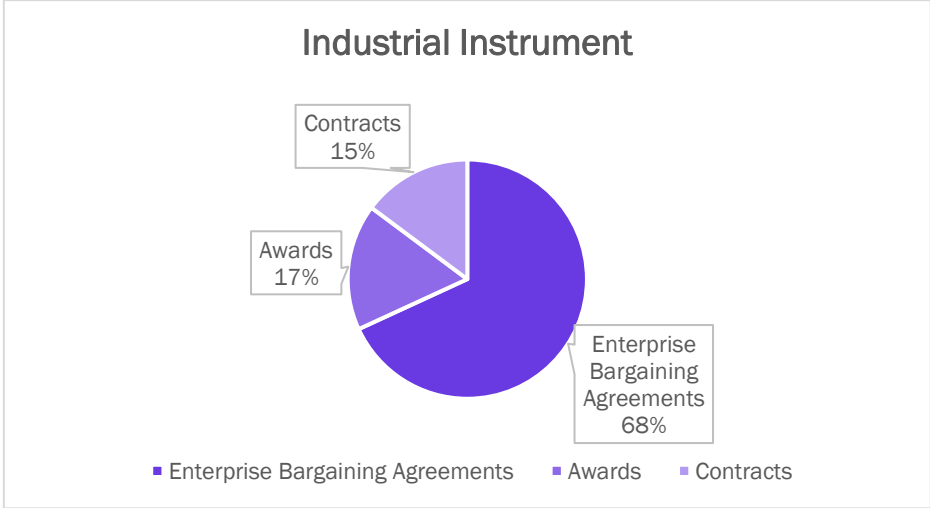
We continue to implement uplift activities to support a stronger understanding and management of human rights and modern slavery risks throughout the operations and supply chain. Three key areas include:

- Our culture reform that is creating an environment for our people that continuously reinforces ethical decision making in line with our purpose, values and principles
- Enhancing operational processes to ensure we have appropriate risk management framework and strengthened controls
- A clearly defined and comprehensive financial crime policy framework and operating model, where all teams across the organisation understand their financial crime obligations, accountabilities and how to identify and report financial crime risks.

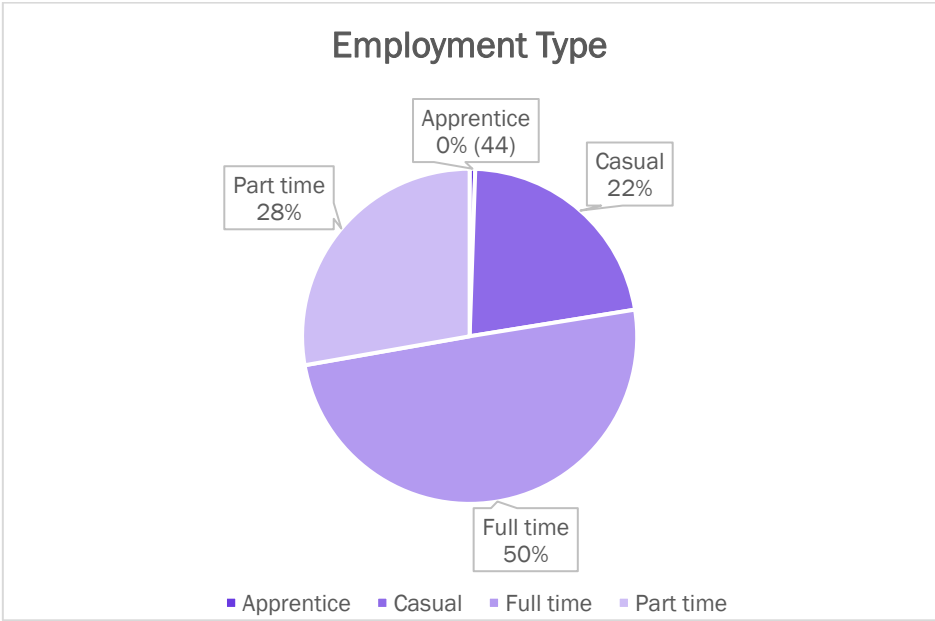
For more information about The Star's transformation please refer to our most recent Annual Report which can be found at starentertainmentgroup.com.au/annual-reports

Workforce Composition

The Star employs approximately 8,000 people through a range of industrial employment instruments and employment types.



Source: The Star



Source: The Star

Criterion 2: OPERATIONS AND SUPPLY CHAIN

The Star’s governing structure is through its Board of Directors and Group Leadership Team, which manages the strategic direction and management of The Star Entertainment Group and its owned and operating entities.

Principal activities of The Star are the management of entertainment and leisure destinations with gaming, entertainment, and hospitality services, including:

- Casino and gaming
- Restaurants and bars
- Food and beverage outlets
- Theatre and entertainment
- Retail outlets
- Conferencing facilities
- Spa and personal services
- Accommodation
- Car parking

Supply Chain

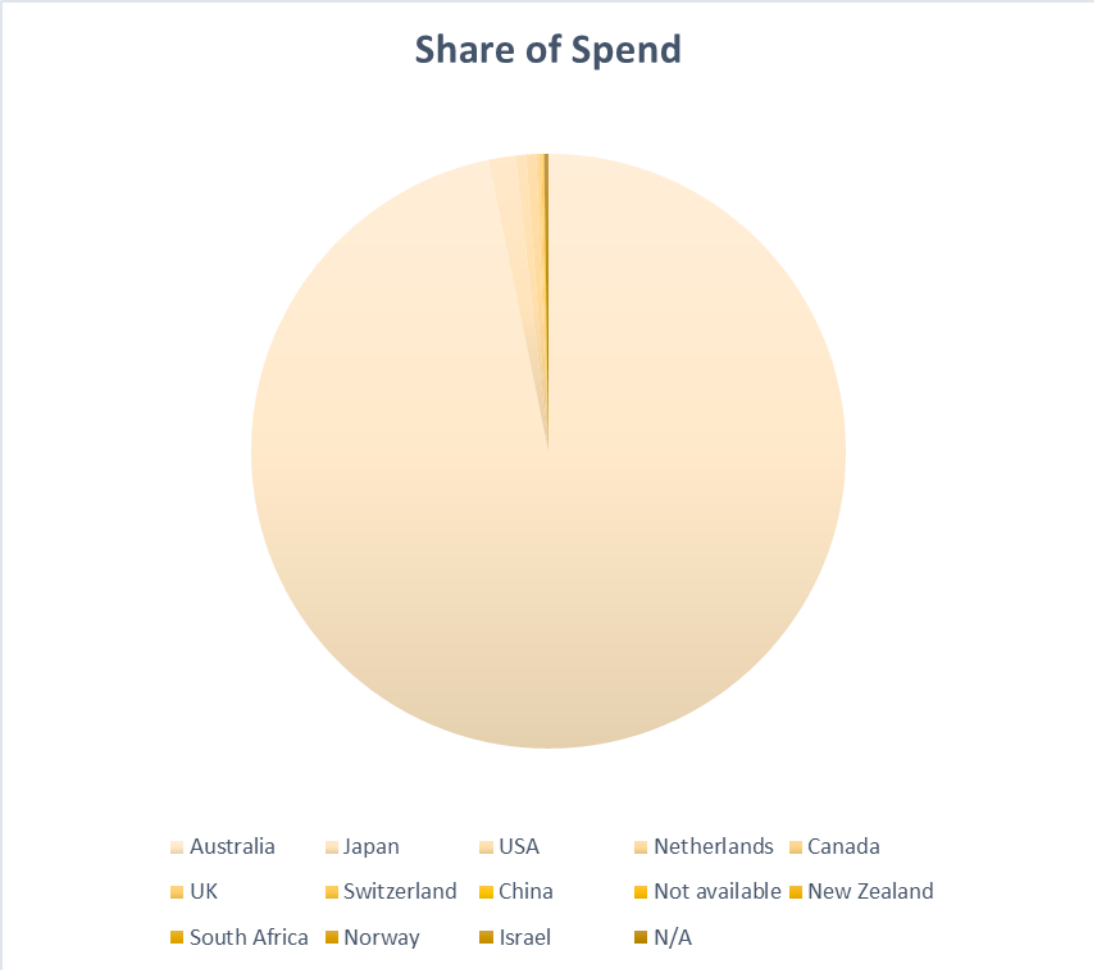
The Star buys goods and services from a diverse supplier base across a range of categories including soft services, food and beverage, construction and equipment, IT, corporate and professional services, transport, and travel.

In FY24, The Star purchased products and services from approximately 916 suppliers with a spend of \$532 million. Supplier spend includes both capital and operational expenditure and does not include payments passed through Accounts Payable that do not relate to the provision of goods and services.



Source: The Star

We expect all our suppliers to operate consistently with our Supplier Code of Conduct, which includes key requirements to act honestly in business and respect human rights, the environment, diversity, and equal opportunity. 97% of total spend is with direct suppliers located in Australia.



Source: The Star¹

¹ N/A refers to immaterial spend (under \$10,000) with smaller vendors.

Criterion 3: RISKS OF MODERN SLAVERY

The Star is a member of the UN Global Compact, and we follow the United Nations Guiding Principles on Business and Human Rights (UNGPs) when developing our approach to understanding and addressing risks of modern slavery within our operations and supply chain.

Through consultation with suppliers and other key stakeholders we seek to understand how our activities may cause, contribute, or be directly linked to adverse human rights impacts so that we can work towards ceasing, preventing, and remedying these impacts.

A risk-based due diligence process, data analysis of our direct suppliers, and utilising information from the Global Slavery Index has allowed The Star to identify the following inherent risks which will continue to guide our approach to our team member education and supplier engagement as we evolve our modern slavery program.

The governance of modern slavery risks is managed through our Group Leadership Team, the Safer Gambling, Governance, and Ethics Committee, and the Board. The Group Leadership Team oversees the strategic direction and implementation of our modern slavery initiatives, ensuring alignment with our corporate values and compliance with the Act. The Safer Gambling, Governance, and Ethics Committee provides oversight and guidance, integrating modern slavery considerations into our broader governance and ethical practices. The Board exercises ultimate oversight, reviewing and approving our policies, risk assessments, and annual Modern Slavery Statements to ensure transparency, accountability, and continuous improvement in addressing modern slavery risks across our operations and supply chains.

Modern Slavery risks in our operations

The Star recognises there is a continuum of exploitation from decent work to exploitative practices, to modern slavery which is at the extreme and most serious form of exploitation. We have considered risks to people in our operations and have identified the following risks and how they are addressed.

Direct Employees

- As an entity that is located and operated in Australia, modern slavery risks are low due to established policies and processes in accordance with Australian regulations and legislation.
- **Risk mitigation:** Policies, processes and governance, consultation with Unions and freedom of association. Training and education.

Indirect employees - Contractors / contingent workers

- Modern slavery / labour exploitation risks are higher in supplier categories that involve employment of migrant workers through third-party or outsourced providers.
- Inherent risks include forced labour, deceptive recruiting, debt bondage, payment, working hours, health, and safety.
- **Risk mitigation:** Tender process includes modern slavery and labour rights criteria, contracts include clauses relating to modern slavery, supplier reviews and audits are conducted throughout the term of the contracts, training and education are provided for relevant team members.

Customers

- Risks associated with modern slavery may be due to money laundering proceeds from organised crime which may include human trafficking and modern slavery / exploitation.
- Human trafficking risks associated with hotels / casinos.
- **Risk mitigation:** Advanced AML/CTF program and probity checks. Advanced security, surveillance, and investigations approach including collaboration with law enforcement. Training and education for relevant team members.

Retail Lease Holders

- Retail lease holders may be at risk of modern slavery in their operations and supply chain.
- **Risk Mitigation:** Contract clauses relating to modern slavery have been introduced in Sydney, with QLD properties to follow.

Case Study: Employee education for modern slavery risks in our operations

The Star recognises that hotels, entertainment venues and casinos are places where the victims of modern slavery, human trafficking or exploitation may be found either as guests, or working as contingent labour. In FY24 the Social Responsibility and Investigations teams began a series of education sessions with frontline team members.

The sessions were informal and interactive, providing valuable insights and discussions about what to look out for, and what to do if indicators of modern slavery were observed.

Our frontline team members are already well trained to identify and report on suspicious activity throughout the business, so these sessions were an opportunity to add a layer of understanding about the indicators of modern slavery and the vulnerabilities of people who may be experiencing this form of crime.

- 9 sessions held across Sydney and Gold Coast, with approximately 120 participants.
- Education sessions involved investigations, Security, Surveillance, Housekeeping, Food and Beverage, Talent, and Acquisition

Modern Slavery education packs were shared with team members on the intranet and via internal communications with these teams.

As part of The Star's UPLIFT program, an online and in-person panel discussion aimed at promoting the message to 'be risk aware and take good care' highlighted modern slavery as an important risk to recognise and address. This session drew an audience of over 600 participants.

A further 33 sessions with Food and Beverage team members included a learning byte on modern slavery indicators from the Financial Crimes team.

Future plans include a podcast with Australia Federal Police Taskforce on Modern Slavery to provide information and education to our team members about modern slavery and interviews discussing modern slavery to be shared via communications and the intranet.

Modern Slavery risks in our Supply chain

In FY22, The Star analysed 99% of direct suppliers to identify inherent modern slavery risks related to industry, geography, and other modern slavery risk indicators. This analysis found that most suppliers were of low-medium inherent risk.

Using this analysis and overlaying information from the 2021 Global Estimates of Modern Slavery, in FY23 The Star created a modern slavery risk matrix to better understand inherent risk deeper in the supply chain, the type of risk and the type of modern slavery that may be involved.

This matrix is used by the social responsibility, procurement, and supply chain teams to develop supporting policies and processes, and to engage with suppliers before and during their engagement with The Star to better understand and address risks.

Modern Slavery Risk Matrix

	Supplier Tier			Why it's a risk area	Type of modern slavery
Category 1: Soft Services	direct	2	3+	Exploitation of migrant and/or vulnerable contingent and contract labour.	Forced labour, deceptive recruiting, debt bondage
Cleaning, housekeeping	X				
Contingent labour	X				
Limousines and Buses	X				
Security	X				
Category 2: Food and Beverage	direct	2	3+	Exploitation of migrant and/or vulnerable workers in local or international processing, fishing, and farming.	Forced labour, deceptive recruiting, debt bondage, human trafficking
Horticulture		X			
Fruit and vegetables		X			
Meat		X			
Food			X		
Beverage			X		
Seafood			X		
Category 3: Manufacturing	direct	2	3+	Exploitation of workers in high-risk geographies and industries including overseas sourcing and production of garments, textiles manufactured goods, components, electronics in China / Southeast Asia, sourcing of raw materials and rare minerals in Africa.	Forced labour, deceptive recruiting, debt bondage, trafficking
Uniforms and Linen			X		
Furniture and fit outs			X		
Guest Amenities			X		
PPE and Gloves			X		
Computers, IT, Software			X		
Electrical and Lighting			X		
Table game chips			X		
Gaming equipment			X		
Category 4: Capital works	direct	2	3+	Exploitation of migrant and/or vulnerable workers in construction labour, and exploitation of workers in high-risk geographies and industries producing construction materials, components, and machinery.	Forced labour, deceptive recruiting, debt bondage.
Construction		X	X		

Criterion 4: ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS

The Star takes a long-term view towards responsible and sustainable procurement with relationships with our suppliers being future focussed and mutually beneficial.

The Star's Modern Slavery Statement FY24 will be the fifth published statement that provides a response to requirements under the Act. The Star's Modern Slavery program is based on the Guidance for Reporting Entities provided by the Australian Government and adopts a human rights due diligence framework, with the following priorities:

POLICY COMMITMENT

The Star makes statements of commitment to respecting human rights and combatting modern slavery in the Annual Report and annual Modern Slavery Statement.

Our commitment to human rights within our operations and supply chain is supported by a framework of governing policies and strategies. Policies are available on the company intranet and company website, and re-enforced through stakeholder engagement, education, and training.

Risk Framework

Modern slavery risks are part of our Risk Management Framework and Risk Appetite Statement. We recognise the critical importance of identifying, assessing, and mitigating modern slavery and human rights risks to uphold our ethical standards and legal obligations. By embedding modern slavery considerations into our risk management processes, we aim for potential and actual human rights impacts to be systematically evaluated and addressed. Our Risk Appetite Statement supports us to proactively manage and minimise modern slavery risks, reinforcing our commitment to ethical business conduct and the protection of human rights throughout our operations and supply chains.

Responsible Procurement Policy

In FY24, we merged our Ethical Sourcing Policy and Procurement Policy to establish the Responsible Procurement Policy. This new policy aims to further integrate ethical, responsible, and sustainable practices into our sourcing of goods and services. It strictly prohibits labour exploitation and modern slavery practices, including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruitment, and child labour. This policy is applied to all sourcing decisions across our properties.

Supplier Code of Conduct

In FY24, we updated our Supplier Code of Conduct to outline expectations and requirements more explicitly in the following key areas. Compliance with this Code is mandatory for all suppliers as part of the contracting process. When a supplier signs a contract or receives a Purchase Order, they accept compliance with this Code.

- Human Rights, labour practices, and anti-discrimination.
- Equal employment opportunity (EEO) and supplier diversity.
- Community involvement.
- Environmental sustainability.
- Workplace health and safety.
- Anti-corruption.

- Supply chain management.
- Privacy.

Supplier management

Since 2021, tenders for major supplier partnerships have included questions related to modern slavery. Responses are assessed by the procurement and sustainability team with scores forming part of the overall consideration and decision-making process.

In FY24, The Star introduced a new contract management system, “Gateway”, and enhanced procurement processes to facilitate greater visibility and risk management for supplier contracts.

Category specific supplier management

To address inherent category risks for cleaning and housekeeping, The Modern Slavery Working Group developed a Strategic Action Plan for the soft services category which includes the following initiatives:

- Increased and targeted questions in the tender process, with higher weights for modern slavery/labour rights in decision-making criteria.
- Detailed information requested as part of the tender process regarding rates of pay, penalties, and entitlements to assess fair wages are accounted for in the tender price, and to provide a basis for on-going audit and review.
- Inclusion of labour rights/modern slavery in tender presentations and on-going supplier reviews.
- Engagement with procurement team, relationship managers and social responsibility through the tender process.
- Checking in with Unions to determine if any known issues or concerns regarding potential suppliers.
- Agreements for new contractors contain monthly KPIs related to awareness of The Star’s Whistleblower Protection policy and process, and compliance with workplace laws.

Supplier contracts

There is a Modern Slavery clause within the standard Purchase Order and Supplier Agreement contracts for new suppliers that require suppliers to:

- comply with all obligations indirectly or directly connected to its Supply Chain, including (without limitation) applicable Modern Slavery Laws.
- upon request, complete and submit documentation with respect to the Supplier’s compliance with Modern Slavery Laws and perform any rectification action required by The Star arising from the submitted documentation.

Further, in the standard Supplier Agreement form, there is an audit clause which states that each of the Supplier’s obligations under the Modern Slavery clause are auditable obligations and at any time during the term of the agreement The Star may, at their expense, audit the supplier’s compliance.

Policy and governance supporting Team Members

Our governance and policy framework is designed to support all team members to work in an environment that ensures their rights and freedom of association as well as health and safety, diversity, equity and inclusion and freedom from bullying, harassment, or discrimination. This includes team members employed directly, or indirectly. Policies are available on the company intranet and external websites and include:

- Code of Conduct – available in four languages, including English.
- Grievance Policy.
- Whistleblowing Protection Policy and independent whistleblowing hotline.
- Procurement Policy.
- Diversity and Inclusion Policy.
- Health and Safety Policy.
- Equal Employment Opportunity.
- Discrimination and Harassment Policy.

Team members undergo mandatory training on key policies such as Code of Conduct which details the rights and responsibilities of all team members and grievance mechanisms that are available. These are further reinforced through internal communications and is part of the induction process through 'Welcome Day' training that all new team members undertake.

Diversity, Equity, and Inclusion

The Star is committed to fostering diversity, equity, and inclusion. It reports annually to the Workplace Gender Equality Agency (WGEA) and was awarded the WGEA Employer of Choice for Gender Equality citation from 2021 to 2023.

At the 2024 Australian LGBTQ+ Inclusion Awards, The Star was recognised as Employer of the Year, named a finalist for the Trans and Gender-Diverse Inclusion Award, and achieved AWEI Gold Employer Status for the second time.

DUE DILIGENCE

Assessing risks

The Star follows a due diligence process to understand and address modern slavery risks in its operations and supply chain.

In FY24, The Star's Modern Slavery Risk Matrix was used to establish a risk profile for each supplier category. In categories where risks are identified, the procurement team initiates actions such as engagement with the sustainability team, an increase in questions and rating criteria during the tender process, self-assessment questionnaires or other interventions.

Modern slavery risks are managed in accordance with The Star's Risk Framework and Risk Appetite Statement.

Inherent risk assessment

The Star has assessed inherent modern slavery risks with 99% of direct suppliers through data analysis in FY23. This includes both capital and operational expenditure and does not include payments passed through Accounts Payable that do not relate to the provision of goods and services.

Modern Slavery Risks were mapped against the Global Estimates of Modern Slavery and other data sources which highlight inherent geography, industry, or product risks.

- Country risk analysis:
 - Risk ratings assigned to each country through an assessment of human rights databases, indexes and reports from internationally recognised bodies, including the Global Rights Index, International Labour Organisation, and World Bank.
- Industry risk analysis:

- Industry assessment of the likelihood and impact of known modern slavery risk factors including labour intensity, use of migrant labour and presence of opaque intermediaries.
- Industry controversy assessment:
 - Media and literature assessment to determine whether any controversies relating to each of the modern slavery risks has occurred in the last 10 years.
- Calculation of inherent risk score:
 - An inherent risk score was created for each supplier that considers these factors to achieve an overall inherent risk per industry/country combination.

Results from the FY23 data analysis indicated most suppliers had a low-medium inherent risk rating. This data analysis is used to support awareness and supplier engagement with higher risk suppliers. We also understand there are risks for vulnerable workers as well as those deeper in the supply chain that need to be better understood and managed.

Self-assessment questionnaires (SAQ)

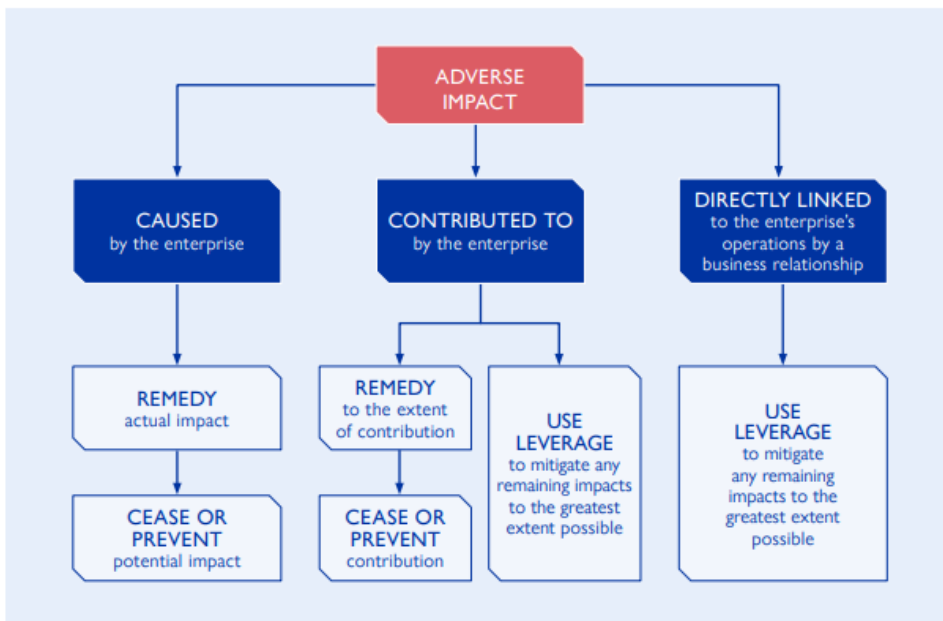
SAQs contain questions that relate to the supplier's profile, nature of business practices and controls. SAQs provide insights into how The Star's suppliers understand and manage modern slavery risks within their operations and supply chain. This provides a basis upon which to develop supplier engagement, awareness, and capability, and take further action if required.

In FY24, The Star engaged with suppliers in the IT hardware, electrical, and lighting procurement categories, which were identified as potentially higher risk and had not been previously surveyed.

Ten suppliers in these categories with whom The Star spent over \$100,000 in FY24 were asked to complete a SAQ. The procurement team oversees the SAQs, with category managers responsible for distributing and scoring them and engaging with suppliers based on their risk profiles.

Assessing involvement in potential or actual adverse impacts

When a potential or actual adverse impact is identified, The Star assesses their involvement to determine which actions should be taken to cease, prevent and/or mitigate the respective adverse impact, as well situations that require remediation, or leverage to influence the business relationship (even when indirect) causing the adverse impact. If The Star deems the situation cannot be adequately remediated, the contract will be terminated.



According to the UNGPs, there are three ways in which an enterprise can be involved in an adverse human and labour rights impact:

1. It may cause the adverse impact through its own activities.
2. It may contribute to the adverse impact through its own activities, either directly or through an outside entity.
3. It may neither cause nor contribute to the adverse impact but may be directly linked to the adverse impact through a business relationship.

Responding to potential or actual adverse impacts

The Star uses guidance from the UNGPs when determining how to respond to potential or actual adverse impacts according to its involvement and are determined on a case-by-case basis to ensure each supplier remains aligned with their contracted Modern Slavery requirements.

Incident management

During FY23, The Star further developed its grievance and incident management process with the introduction of a Head of Incident, Breaches & Whistleblower Governance and Whistleblowing and Breach Management team.

Grievances, incidents, or potential adverse impacts are raised by team members or suppliers and their employees via the whistleblowing, breach reporting or employee relations channels and are managed through the breach or whistleblowing process, investigations, people and performance or legal teams.

Where matters involve potential modern slavery or labour exploitation incidents, the Group Manager Social Responsibility and Modern Slavery Working Group and relevant business managers are engaged and involved as required.

INTEGRATING FINDINGS AND TAKING ACTION

The Star continues to evolve its response to modern slavery and aims to learn from experiences to build capability in understanding and addressing risks.

When risks of modern slavery or labour exploitation are identified, actions taken may include training and education related to the risk to relevant team members and/or suppliers, changes in policy, process and/or contract management.

COMMUNICATING AND REPORTING

The Star communicates its activities and progress by providing public reporting through the Annual Modern Slavery Statement and Annual Report.

The Act requires companies to adopt a continuous improvement approach and The Star has continued to enhance its program and reporting accordingly.

In the latest research project by Monash University “Modern Slavery Disclosure Quality Ratings: [ASX100 Companies Update 2023](#)” The Star’s ratings have improved to “B” for the FY22 Modern Slavery Statement up from an “C” in FY21 and an “E” in FY20.

STAKEHOLDER ENGAGEMENT

We prioritise the protection of rights for stakeholders affected by modern slavery risks and incidents. Our People and Performance team, along with our Investigations team, play a crucial role in this process. By maintaining open lines of communication and providing necessary support, we are committed to addressing concerns promptly and effectively, ensuring transparency and fairness at every step. This collaborative approach underscores our dedication to upholding human rights and ethical standards across our operations and supply chains.

Modern Slavery Working Group

The Modern Slavery Working Group meets regularly to build our response to the risks of modern slavery in our operations and supply chain. The group helps to deliver on our commitments made in The Star Modern Slavery Statement and build plans for improvement. The group contains and is guided by senior leaders from within our procurement, supply chain, people and performance, operations, and social responsibility and sustainability teams.

Training and Education

Raising awareness and skills among key team members is an on-going aspect of The Star’s modern slavery program.

Online education regarding The Star’s modern slavery program was introduced in 2021 and over 5,000 employees completed the voluntary training program. In 2023, the voluntary training program was replaced by new modern slavery training, which is now mandatory for our legal, procurement, social responsibility and sustainability, and supply chain teams.

Modern slavery training is now mandatory for our legal, procurement, social responsibility, and supply chain teams.

The Modern Slavery Learning Module includes the following:

- Information about who may be affected by modern slavery, how it impacts people, the statistics that are available and the forms of slavery that exist
- The risk of modern slavery as it relates to geography, industry, products, or services
- Our responsibilities of ensuring we do not cause, contribute, or be directly linked to modern slavery within our operations or supply chain, including examples and case studies
- Information relating to modern slavery in Australia, and characteristics of a business or supplier relationship that may indicate risks of modern slavery

- Supply chain transparency, and how it relates to the responsibilities of various departments within the business
- Modern slavery legislation around the world, and in Australia
- The Star's ethical sourcing policy and commitments to ethical supply chain management.

Additional training and education are undertaken with team members based on specific risks within supplier categories, or our operations. In FY24, this was done as a series of education sessions with teams including talent acquisition, food and beverage, hospitality, security and surveillance, as well as procurement.

Whistleblowing and access to grievance mechanisms

The Star's "Raise It" campaign, Whistleblower Protection Policy and independent whistleblower service encourage team members, suppliers, and their employees to raise issues anonymously and in multiple languages via an external 1800 number and confidential online platform.

The Raise It campaign is regularly communicated throughout each of our properties, via communications channels and on the company intranet.

Information about our commitments to supporting the rights of employees and our suppliers and access to the whistleblower program is included in the induction training undertaken by all employees, as well as contractors entering The Star properties. This ensures this important information is accessed by our team members, and contracted workers including cleaners, housekeepers, and contingent labour hires.

The Supplier Code of Conduct is available on The Star's corporate website and contains details of The Star's independent whistleblowing and integrity service, providing a mechanism for workers to raise concerns regarding working conditions.

In addition, suppliers are expected to have their own grievance mechanism process and support their employees to make anonymous reports. This framework requirement is vetted as part of our Request for Tender or Proposal for key suppliers.

Supplier Engagement

Supplier engagement is undertaken through the procurement process, supplier management and self-assessment questionnaires for higher inherent risk supplier categories.

Sustainability and social responsibility are a regular agenda item during supplier reviews and discussions.

In FY24, The Star sustainability team facilitated engagements with four key suppliers to discuss best practices in modern slavery, social responsibility, and sustainability. These sessions provided an opportunity to share knowledge and learnings and built trusting and transparent relationships so that together we can better understand and manage human rights and environmental risks with our supplier partners.

Working with Unions and freedom of association

The Star is committed to supporting our team members' rights to choose whether to join a union or employer association and to participate in industrial activities. We believe in the principles of freedom of association and collective bargaining, recognizing them as essential to fostering a fair and just workplace.

Union representatives are invited to attend our Team Member welcome days, ensuring that new employees are aware of their rights and the support available to them. We actively engage with relevant unions throughout the Enterprise Bargaining process, working collaboratively to negotiate fair terms and conditions on behalf of our team members.

Moreover, we encourage open dialogue and transparent communication between our team members, their representatives, and management. This approach not only empowers our workforce but also helps us address and resolve workplace issues effectively. By upholding these values, The Star aims to create an inclusive and supportive environment where every team member can exercise their rights confidently and contribute to our collective success.

Memberships and associations

The Star is a participant of the UN Global Compact Network and takes part in the UN Global Compact Network Australia Community of Practice for Modern Slavery and the annual Dialogue on Human Rights.

We also regularly participate in industry education sessions and online learning events which provide access to best-practice examples and lived experience from modern slavery survivors.

Criterion 5: TRACKING EFFECTIVENESS

Measures and KPIs including completion rates for modern slavery training, team member and supplier engagement are tracked as indicators of effectiveness of the program.

Training and education

- During the reporting period, 36 team members in the procurement, supply chain, legal and social responsibility and sustainability teams were required to undertake modern slavery training, with 92% completion.
- In addition, there have been multiple in-person education sessions that have resulted in deeper engagement and understanding of modern slavery risks among team members.

Team member engagement

In FY24 team members proactively contacted the Group Manager Social Responsibility with questions or requests for supplier engagement regarding potential modern slavery risks that had been identified. This demonstrates effectiveness in training and engagement in raising awareness and increasing involvement in understanding and addressing risks.

In the reporting period, the Modern Slavery Working Group met 6 times and has expanded membership to include a broader range of stakeholders.

Supplier engagement

Following a focus on preventing labour exploitation in cleaning contracts, there has been an increase in awareness and on-going discussions about these issues with team members and their suppliers.

With a knowledge that TSEG places importance on modern slavery and labour exploitation, this is more frequently part of supplier engagement discussions among other supplier categories also, with modern slavery and sustainability being a regular agenda item for discussion.

Criterion 6: CONSULTATION WITH ENTITIES OWNED OR CONTROLLED

The Star operates in Australia through The Star Sydney, The Star Gold Coast and Treasury Brisbane. These entities, as well as controlled entities detailed in The Star’s most recent Annual Report, operate under the governance of The Star Entertainment Group Board and in accordance with The Star’s policies, therefore no separate consultation was required when preparing this Statement.

The Star manages the Gold Coast Convention and Exhibition Centre on behalf of the Queensland Government, and has investments in strategic joint ventures including, but not limited to Destination Brisbane Consortium and Destination Gold Coast Consortium. Consultation in relation to the procurement of goods and services forms part of the ongoing engagement with these entities.

Criterion 7: OTHER RELEVANT INFORMATION

The Star is committed to developing and implementing programs that build capability over time. Our goal is to make a meaningful contribution to addressing the global issue of modern slavery, which is both complex and far-reaching. By continuously improving our initiatives and strategies, we strive to enhance our effectiveness and create a lasting impact in the fight against modern slavery. Our dedication to this cause reflects our broader commitment to social responsibility and ethical business practices.

Key milestones and plans for future development include:

2020	<ul style="list-style-type: none"> • Ethical Sourcing Policy approved by The Board
2021	<ul style="list-style-type: none"> • Modern Slavery Working Group established. • Online Modern Slavery training introduced. • Clauses related to modern slavery and the right to audit included in all supplier contracts and purchase orders. • Questions relating to modern slavery risks included in the tender process for key suppliers. • 78% of direct suppliers analysed for modern slavery risks. • Self-assessment questionnaires conducted with higher risk suppliers
2022	<ul style="list-style-type: none"> • 99% of direct suppliers analysed for modern slavery risks. • Modern Slavery training updated. • New independent whistleblowing hotline and reporting platform introduced. • Membership of Cleaning Accountability Framework (CAF) • Self-assessment questionnaires conducted with higher risk suppliers.
2023	<ul style="list-style-type: none"> • Modern Slavery Risk Matrix created. • Audits on 4 cleaning companies undertaken. • Strategic Action Plan created for soft services (cleaning/housekeeping), with tender process reviewed and updated. • Self-assessment questionnaires conducted with higher risk suppliers.
2024	<ul style="list-style-type: none"> • Category specific team member and supplier engagement, training, and education completed including sessions for Investigations, Talent

Acquisition, Housekeeping, Security and Surveillance Teams (SYD and QLD)

- Supplier engagement sessions with 4 key suppliers held to discuss modern slavery, social responsibility, and sustainability.
- Created “Responsible Procurement Policy” to combine and uplift “Ethical Sourcing Policy” and “Procurement Policy”.
- Updated “Supplier Code of Conduct” to provide additional details around modern slavery and human rights.
- A Modern Slavery Resources section was created in the supplier section of TSEG website utilising resources from UNGCNA and Attorney General’s Department.
- A focused intent to rationalise the supplier base, with fewer suppliers, better relationships, and greater visibility to safeguard our guests, staff and partners.
- Improved systems and controls to manage contracts through new procurement system ‘Gatekeeper’.
- Self-assessment questionnaires conducted with higher risk suppliers.

2025 and beyond

In addition to on-going actions to assess and address modern slavery risks outlined in this Statement, The Star will, in future reporting periods look to:

- Implement on-line tool to improve visibility in extended supply chain for modern slavery risks, and manage supplier engagement and reporting.
 - Continue to review and improve selection, onboarding and contracting of suppliers to understand and manage risks, including contract clauses.
 - Continue to enhance education and engagement to raise awareness of modern slavery among team members and suppliers.
 - Continue to strengthen controls related to modern slavery risks in line with our uplift of governance and risk management as part of The Star’s transformation.
-

This statement was approved by the Board of The Star Entertainment Group Limited on 26 September 2024.

Signed,



Neale O’Connell

Acting Group Chief Executive Officer and Interim Group Chief Financial Officer

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

The Star supports team members, suppliers and their employees to raise grievances or report issues anonymously by calling **1800 319 826** (a free call within Australia 7 am - midnight business days), or by visiting star.relyplatform.com/report

These services enable anonymous reporting, and are available in multiple languages.

[Click here to read our Whistleblower Protection Policy](#)