

MODERN SLAVERY STATEMENT FY2022

THE  STAR
ENTERTAINMENT GROUP





Artist's impression only. Concept image The Star Gold Coast masterplan.
© Destination Gold Coast Consortium.

ACKNOWLEDGMENT OF COUNTRY

The Star respectfully acknowledges the Traditional Owners of the land where our properties are situated. This includes the Turrbal and Jagera Traditional Owners of the Brisbane region, the Dangan Balun (Five Rivers) people of the Gold Coast, and the Traditional Owners of the land in Pymont, the Gadigal people of the Eora Nation.

We also wish to pay our respects to Elders past and present.



'Jalaman Making Honey' artwork for Reconciliation by Devene Cockatoo-Collins.

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") to understand and address modern slavery risks in our business, operations and supply chain for the financial year 1 July 2021 – 30 June 2022. This statement has been prepared and produced pursuant to section 13 of the Act and covers The Star as a single reporting entity. It has been approved by the Board of Directors and has been signed by the Group CEO and Managing Director

Cover image: Concept image of QWB project only. © Destination Brisbane Consortium.

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A MESSAGE FROM OUR GROUP CEO

The Star is committed to upholding and protecting the rights and freedoms of workers in our operations and supply chain, wherever they may live and work.

Our program for identifying and addressing the risks of modern slavery has continued to evolve as we seek to engage with our suppliers to better understand the risks that may be in their business. In this reporting period, we have continued to educate our people, engage with suppliers in higher risk categories and have progressed our due diligence processes.

It is a confronting fact that according to the Global Estimates of Modern Slavery, around 50 million people are living in situations of modern slavery every day, which is an increase of over 10 million people in the past 5 years. This is due to the compounded crisis of COVID-19, armed conflicts, and climate change¹. Of that number, forced labour accounts for 27.6 million and forced marriage for 22 million people.

Our FY22 Modern Slavery Statement sets out our approach and progress for this financial year and outlines our plans for future development.

Sincerely

Robbie Cooke
Group CEO and Managing Director
The Star Entertainment Group

¹Global Estimates of Modern Slavery: Forced Labour and Forced Marriage International Labour Organization (ILO), Walk Free, and International Organization for Migration (IOM), Geneva, 2022



INTRODUCTION

The Star is committed to promoting and supporting the rights of our team members, customers, and the communities in which we operate. We follow the United Nations Guiding Principles on Human Rights (“**UN Guiding Principles**”) and expect that our suppliers share these commitments and values.

This includes maintaining labour standards and respecting human rights within throughout their business activities.

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.

“The 2021 Global Estimates indicate there are 50 million people 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. This number translates to nearly one of every 150 people in the world”².

OUR SUSTAINABILITY STRATEGY

Responsible Business, Sustainable Destinations

This year we launched our new Sustainability Strategy, *Responsible Business, Sustainable Destinations* which replaced the previous ‘Our Bright Future’ Sustainability Strategy 2016 – 2021. We understand that best practice environmental, social and governance (**ESG**) performance is essential to delivering growth and long-term shared value to our customers, our communities and especially our people which are at the heart of our strategy.

A framework was established that addressed each of our most material issues and we determined how our strategy would support the United Nations Sustainable Development Goals. The 3-pillar strategic framework is articulated under two keys areas:

RESPONSIBLE BUSINESS focuses on practices across ESG areas, including ethical sourcing and human rights, safer gambling, and transparency

SUSTAINABLE DESTINATIONS focuses on creating and maintaining sustainable destinations ensuring that our world class properties are best practice in design, operations, and resilience, and are welcoming to all.



Material issues

To ensure our strategies focus on our most material ESG issues and that we hold ourselves to account reporting on those issues that are most material to our business and our stakeholders, our materiality assessment process is carried out each year and can be found on our website.

Our process takes a best practice approach, is conducted by an external consultant, and includes peer assessments, interviews, assessments of stakeholder feedback and several other inputs that derive the most material ESG issues for our business.

Material issues are mapped against the United Nation’s Sustainable Development Goals to align our actions with global sustainability priorities. ‘Sustainable and ethical supply chain’ forms one of our fifteen most material issues with our strategy addressing modern slavery and human rights and further sub issues. In addition to considering assurance, global standards, and frameworks, this year we have mapped our material issues to the relevant Sustainability Accounting Standards Board (**SASB**) topics for the ‘Casino & Gaming’ industry which includes primary topics of Business Ethics and secondary topics of Human Rights. The alignment of our material issues to the SASB can be found on page 17 of our 2022 Sustainability Report

²Global Estimates of Modern Slavery: Forced Labour and Forced Marriage International Labour Organization (ILO), Walk Free, and International Organization for Migration (IOM), Geneva, 2022

REPORTING ENTITY – THE STAR ENTERTAINMENT GROUP

The Star is an ASX-200 listed company that owns and operates integrated resorts: The Star Sydney; The Star Gold Coast; and Treasury Brisbane. The Star also manages the Gold Coast Convention and Exhibition Centre on behalf of the Queensland Government. The Star and its joint venture (JV) partners Chow Tai Fook Enterprises and Far East Consortium Limited are delivering a multi-billion-dollar redevelopment of Queen’s Wharf in Brisbane. Expected to progressively open in the second half of 2023, Queen’s Wharf Brisbane will deliver transformational impacts on Queensland jobs, training, and tourism, both domestic and international. In November 2018, the QLD Government approved a \$2 billion-plus masterplan for further tourism assets at The Star Gold Coast, to be developed by The Star and its JV partners.

In July 2022, the NSW Government delivered an update to the Pyrmont Peninsula Place Strategy to map out future growth in the local area and how it relates to the local community, local businesses, tourism and entertainment.

The plan includes provisions for construction of a 105 metre, luxury six-star hotel, two new theatres – including a 1550-seat Broadway style venue and new rooftop dining at The Star Sydney’s site.

Together The Star and its JV partners also acquired the Sheraton Grand Mirage on the Gold Coast.

The Star employs around 8,000 people across our operations, in a mix of permanent, part-time, casual roles and through limited agency labour hire.

In the reporting period we spent around \$444 million across our operations and supply chain for goods and services from a diverse supplier base. 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.

We take great pride in our commitment to supporting the communities in which we operate across Sydney and South-East Queensland. Following the reviews into how we operate as an organisation we are committed to transforming our business at every level and towards building safer, stronger, more sustainable future at The Star.

For detailed information on The Star Entertainment Group structure please refer to Page 64 in the Annual Report 2022.

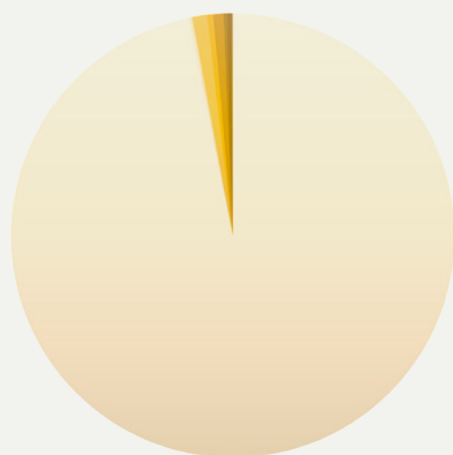
OPERATIONS AND SUPPLY CHAIN

The Star's governing structure is through its Board of Directors and Executive Team, which manages the strategic direction and management of the company and its owned and operated entities.

The Star owns and manages integrated resorts that provide facilities and services in Sydney, Brisbane and The Gold Coast, 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

Share of Spend



- Australia
- Canada
- China
- Germany
- Hong Kong
- Israel
- Japan
- Mexico
- Netherlands
- New Zealand
- Norway
- Not available
- South Africa
- UK
- USA

In FY22, The Star purchased products and services from approximately 1,925 suppliers over 12 categories with a spend of approximately \$444 million. This is an increase on the previous year's spend, which is due to FY21 reflecting reduced capital spend and the impact of COVID-19 on operations.

The majority of our direct suppliers are located in Australia (97%)

SUPPLIER CATEGORIES AND FY2022 SPEND	
\$Million	
99.3	Hospitality (includes Food and Beverage)
78.1	Property Services & Maintenance
48.7	Marketing
47.1	IT (hardware, software, services)
58.3	Construction and Equipment
30.7	Gaming equipment and consumables
3.9	Corporate Services
36.7	Professional Services
23.3	Contingent labour
7.2	Transport
6.9	Travel
3.8	People & Performance (training and recruitment)

Supplier category 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.

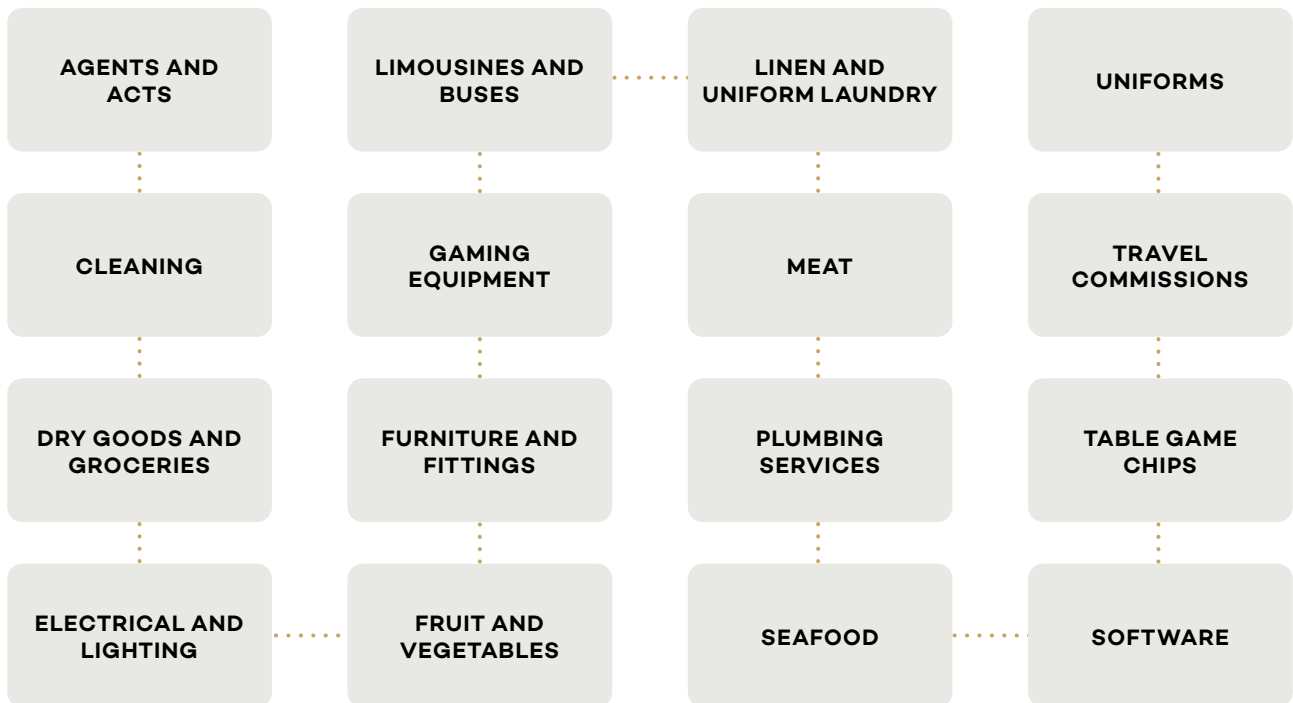
RISKS OF MODERN SLAVERY

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 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.

Through a risk-based due diligence process and analysis by an external consultant conducted in FY2021, The Star has identified suppliers in the following categories as representing higher inherent risks for modern slavery.

*“There are 27.6 million people in situations of forced labour on any given day. This absolute number translates to 3.5 people in forced labour for every thousand people in the world. Women and girls make up 11.8 million of the total in forced labour. More than 3.3 million of all those in forced labour are children.”*³



³Global Estimates of Modern Slavery: Forced Labour and Forced Marriage International Labour Organization (ILO), Walk Free, and International Organization for Migration (IOM), Geneva, 2022

KEY RISK CATEGORIES

A focus of our activities in FY22 was to engage more deeply with supplier categories with greater risks for modern slavery.

CLEANING

Through our due diligence process we identified cleaning as a category with inherent risk and in FY22 The Star became members of the Cleaning Accreditation Framework (CAF) to uplift our capability and understanding of these risks and how to mitigate and remediate them.

After receiving employee complaints via our grievance mechanism regarding one of our suppliers, we arranged an independent investigation into this supplier.

While these matters were not modern slavery risks, they were considered a risk for poor labour practices and a potential red flag for modern slavery so were treated seriously, reported through to the Ethics Panel and the Board.

The Modern Slavery Working Group and Category Managers used this experience and membership advice and information from CAF to workshop how to improve our engagement with cleaning and other contingent agencies, with improvements made in early FY23 to on-boarding practices and on-going relationship management.

FOOD SUPPLY

Food supply has remained a focus for The Star in 2022 with the development of a Responsible Seafood Sourcing Policy that intends to provide our teams with the required governance, clarity and structure to make the right decisions while in operation to align with company goals. The Policy identifies a set of clear and accountable targets that the Star will work toward over the coming term and that lead us into 2030.

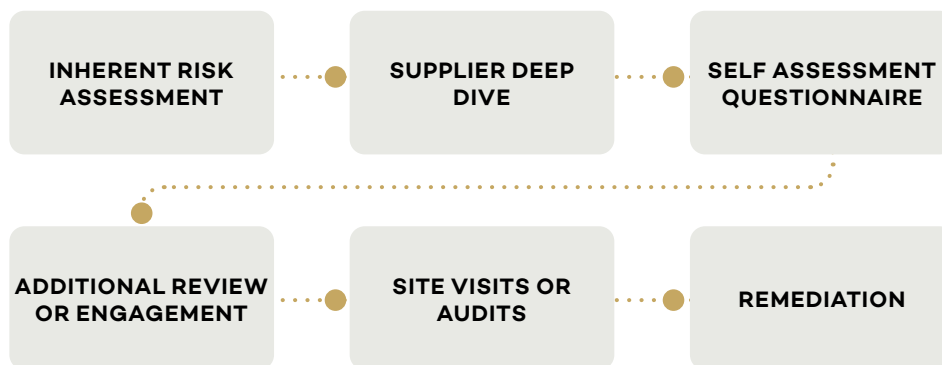
In addition, The Star has partnered with a number of fruit and vegetable suppliers and third party consultants to identify and address modern slavery risk within the end-to-end supply chain, recognising that it is through partnerships and aligned values that improvement can occur.

ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS

The Star's approach to understanding and addressing modern slavery risks is multifaceted, involving multiple stakeholders across the organisation.

RISK BASED DUE DILLIGENCE PROCESS

The following process was established in FY21, as a result of the risk analysis undertaken by an external consultant.



1. INHERENT RISK ASSESSMENT

An assessment was conducted in the reporting period utilising an external consultant's proprietary assessment tool. The risk assessment was undertaken using The Star's supplier spend data for the period FY21 as well as Global Industry Classification Standard (GICS) codes. The risk assessment tool utilises the following information and methodology:

- **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 on 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.

2. SUPPLIER DEEP-DIVE

Supplier Deep-dives are desktop research reviews on suppliers or potential suppliers to better understand their operational governance and potential risks of modern slavery.

3. SELF-ASSESSMENT QUESTIONNAIRE

Following the inherent risk assessment, The Star engaged with selected suppliers to undertake a Self-Assessment Questionnaire. These suppliers were either rated higher risk, had a higher risk rating in the previous year, or had not responded to the previous year's survey.

The Self-Assessment Questionnaire contains questions that relate to the supplier's profile, nature of business practices and controls.

The information obtained through the Self-Assessment Questionnaire assists with understanding what risks may be associated with these suppliers, and to establish appropriate engagement.

4. SUPPLIER ENGAGEMENT

Following the Self-Assessment Questionnaire responses there were some suppliers that required further clarification or review. As the self-assessment questionnaire process concluded at the end of FY22, this supplier engagement will be undertaken during FY23 to gain a greater understanding of how modern slavery risks are being managed by these suppliers.

5. SITE VISITS OR AUDITS

Where there is additional engagement required, either through questionnaire responses or otherwise identified, The Star would undertake site visits or Audits as part of our contractual agreements with suppliers. In the reporting period, one independent investigation was conducted.

6. REMEDIATION

There have been no instances of modern slavery that were reported or identified; therefore, remediation or remedy has not been undertaken. However, in the event of The Star finding instances of having caused or contributed to modern slavery, we would develop a remediation plan in conjunction with the supplier on a case-by-case basis. This process would be subject to oversight by our Ethics Panel

GOVERNING POLICIES AND STRATEGIES

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 our strategies are re-enforced through internal and external communications as well as training modules.

Many of these policies and strategies are overseen by our Ethics Panel, which is made up of key executives responsible for conduct risk management, as well as an independent ethics expert.

1. SUPPLIER MANAGEMENT STRATEGY

Our Supplier Management Strategy is multifaceted and incorporates elements of our modern slavery approach, our Supplier Code of Conduct, our supplier expectations, the way we classify, and risk assess our suppliers, and the way we onboard suppliers into our business.

REQUEST FOR TENDER OR PROPOSAL

During the reporting period all tenders for major supplier partnerships included questions related to modern slavery. Responses were assessed by the Social Responsibility team with scores forming part of the overall consideration and decision-making process.

SUPPLIER CODE OF CONDUCT

This policy establishes requirements of our suppliers across our ESG business areas. The Code outlines our expectations on suppliers in the following areas:

- **Human Rights, labour practices, and anti-discrimination**
- **Equal employment opportunity (EEO) and supplier diversity**
- **Community involvement**
- **Environmental**
- **Work health and safety**
- **Anti-corruption**
- **Supply chain management**
- **Privacy**

Each organisation that supplies our business makes a declaration during their onboarding phase that they have read and will adhere to the Code.

GRIEVANCE MECHANISM

The Supplier Code of Conduct is available on The Star Entertainment Group website and contains details of The Star's independent whistleblowing service, providing a mechanism for workers in our supply chain to share their 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 is question forms part of our Request for Tender or Proposal, as well as our Self-Assessment Questionnaire.

ETHICAL SOURCING POLICY

To ensure a coordinated approach across our Supplier Management Strategy and one that upholds human rights, we operate under our Ethical Sourcing Policy which articulates the ways in which the sourcing of goods and services will support ethical, responsible and sustainable practices (including by addressing modern slavery risk in our supply chain. This policy is applied in all our sourcing decisions across each of our properties.

SUPPLIER CONTRACTS

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

- a. comply with all obligations indirectly or directly connected to its Supply Chain, including (without limitation) applicable Modern Slavery Laws;
- b. 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. Furthermore, in the standard form Supplier Agreement 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.

2. GOVERNANCE AND OVERSIGHT

The Star has a governance structure that ensures human rights impacts are considered and addressed with oversight from relevant committees.

MODERN SLAVERY WORKING GROUP

The Modern Slavery Working Group meets at least six times annually to assess and address modern slavery risks in our operations and supply chain and to build our response to these risks. They also help deliver on our commitments made in The Star Modern Slavery Statement and work on plans for improvement. The team contains and is guided by senior leaders from within our procurement, supply chain and social responsibility teams.

ETHICS PANEL

The Ethics Panel meets as frequently as required but not fewer than four times per annum, and where possible a month prior to the Board Remuneration, People and Social Responsibility (RPSR) Committee. The Ethics Panel consists of multiple stakeholders across the business, as well as an independent ethics expert. The Ethics Panel considers ethical issues, provides insight and oversight of matters relating to the Code of Conduct and related policies, and reports to the RPSR Committee

REMUNERATION, PEOPLE AND SOCIAL RESPONSIBILITY (RPSR) COMMITTEE

The role of the RPSR Committee is to consider and make recommendations to the Board, on matters relating to human resources (excluding matters relating to the appointment of Non-Executive Directors that are the responsibility of the Board) and corporate social responsibility, the contribution and alignment of those matters to the Company's vision and strategic plan, and to assist the Board with its oversight of the Company's strategy, policies, practices, and controls.

3. 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. The following policies are available on the company intranet and external websites:

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

Team members undergo mandatory training on key policies such as Code of Conduct and 'Do the Right Thing' which details the rights and responsibilities of all team members and grievance mechanisms that are available. These are further re-enforced through internal communications and is part of the induction process through 'welcome day' training that all new team members undertake.

The Star is committed to diversity, equity and inclusion and reports annually to the Workplace Gender Equality agency (WGEA). In 2021 The Star was awarded the WGEA Employer of Choice for Gender Equality and was recognised for LGBTIQ+ inclusiveness in the workplace with a Silver Award in 2021 by the Australian Workplace Equality Index (AWEI).

4. FREEDOM OF ASSOCIATION

The Star supports our team members to choose whether to join a union or employer association or to participate in industrial activities. Union representatives are invited to attend Team Member welcome days, and relevant unions are actively engaged with the Enterprise Bargaining process on behalf of their members.

5. EMPLOYEE EDUCATION AND TRAINING

Raising awareness and skills among key team members such as Procurement Category Managers is an on-going aspect of The Star's modern slavery program. In 2021, a modern slavery online training module was developed to raise awareness and understanding of the issues of modern slavery and how The Star is working to understand and address risks within its operations and supply chain.

The learning module is mandatory for the key leaders and team members working in Procurement and Supply Chain. It is also available for all staff to complete voluntarily.

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

6. MEMBERSHIPS AND ASSOCIATIONS

The Star is committed to driving collaboration and best practice and in 2021 became a signatory member of the UN Global Compact, participating in the Early Adopter Communication on Progress program in the reporting period. As part of our membership, we participate in the Modern Slavery Community of practice to share learnings with other UNGCNA members, in line with the principle of continuous improvement.

7. CUSTOMER AND STAKEHOLDER ENGAGEMENT

The Star receives requests from customers and other stakeholders for information about our approach to modern slavery as part of their modern slavery due diligence process. We are pleased to be able to contribute to building capability throughout our value chain and will continue to develop these knowledge sharing opportunities in the future.

MEASURING EFFECTIVENESS

During the reporting period The Star continued to build on our modern slavery framework and were able to measure the following outcomes.

RISK ANALYSIS

In FY22 we met our objective to analyse the FY21 data of 99% of our direct suppliers. Supplier category 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.

As part of our supplier due diligence, we requested that 22 of our suppliers to complete a Self-Assessment Questionnaire (SAQ). Of these, 17 suppliers provided a response within the reporting period.

TRAINING FOR TEAM MEMBERS

Raising awareness and skills among team members is an essential and ongoing aspect of our modern slavery program.

Our team members involved directly in the supply chain, procurement, and roles related to modern slavery risks are required to undertake mandatory online modern slavery training through our Learning Management System. In FY22 all these team members completed the training ensuring we reached our target of 100% completion

The Modern Slavery Training Module is available to all team members and contractors and through communications and awareness raising activities, they are encouraged to complete. By the end of FY22 86% of team members and contractors had completed the training voluntarily which exceeded expectations.

CONSULTATION WITH ENTITIES OWNED OR CONTROLLED

The Star operates in Australia through wholly owned entities The Star Sydney, The Star Gold Coast and Treasury Brisbane, and manages the Gold Coast Convention and Exhibition Centre on behalf of the QLD Government. As these entities operate under the governance of The Star Board and in accordance with The Star's standards, processes and controls including procurement and sourcing, no separate consultation was required when preparing this Statement.

The Star also has non-controlling interests in other entities including Sheraton Grand Mirage Resort, Destination Brisbane Consortium and Destination Gold Coast Consortium which are not reported in this statement.



OTHER RELEVANT INFORMATION

The Star endeavours to develop and implement programs that build capability over time so that we can contribute to addressing the global issue of modern slavery which is complex and far-reaching.


OUTCOMES AND FUTURE PLANS

The table below summarises The Star's key activities and outcomes and plans for the future.

ITEM	ACTIONS	OUTCOMES FY21	OUTCOMES FY22	PLANNED FY23
Training and education	Create and deploy an online Modern Slavery learning program	97% mandatory completion, 69% voluntary completion	100% mandatory completion, 86% voluntary completion	Update e-learning module
Monitor for evidence of modern slavery risks in higher risk suppliers.	Establish media monitoring for medium-high risk suppliers	Complete	On-going	Continue
Develop modern slavery risk assessment and due diligence framework	Engage consultant to develop a risk assessment framework and SAQ	Complete	On-going	Engage with consultant to assess current framework and make recommendations
Conduct risk assessment	Determine inherent risks based on country and industry and other factors	78% of direct suppliers assessed through data analysis.	99% of direct suppliers assessed through data analysis.	Refine and build
Engage with higher risk direct suppliers	Build understanding and relationships	SAQs sent to 38 higher risk (direct) suppliers. Meetings held with higher risk suppliers.	SAQs sent to 22 higher risk (direct) suppliers. Meetings held with higher risk suppliers	Build supplier engagement through SAQ responses.
Embed modern slavery into relevant processes	Ensure relevant policies, processes and documents include modern slavery information and requirements	Modern slavery clause included in standard form contracts, and purchase orders.	Modern Slavery questions included in all major supplier tenders and part of the procurement process.	Refine and build internal processes and controls
Deepen understanding of risks beyond Tier 1	Increase awareness of deeper supply chain risks	N/A	Focus on vulnerable categories: food supply/seafood	Explore data analytics approach for beyond Tier 1
Memberships and Associations	Build and share knowledge, and capability	N/A	Attended UN GCNA Modern Slavery Community of Practice. Became Members of Cleaning Accreditation Framework.	Develop engagement opportunities
Modern slavery assurance program	Identify and complete internal assurance process	N/A	Postponed	Review

This statement was approved by the Board of The Star Entertainment Group Limited on 14 December 2022.

Signed,



Robbie Cooke
Group CEO and Managing Director
The Star Entertainment Group

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