



# Modern Slavery Statement 2021





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# Reporting Entities

## Aristocrat Australian Reporting Entities:

1. Aristocrat Leisure Limited (ACN 002 818 368)
2. Aristocrat International Pty Ltd (ACN 000 148 158)
3. Aristocrat Technologies Australia Pty Limited (ACN 001 660 715)
4. System 7000 Pty Ltd (ACN 605 116 783)

**Legislation:** *Modern Slavery Act 2018* (Cth)  
**(Australian Modern Slavery Act)**

**Reporting Year:** 2

**Reporting Period:** 1 October 2020 – 30 September 2021 **(Financial Year 2021)**

**Type of statement:** joint statement

This Modern Slavery Statement is submitted in accordance with section 14 of the Australian Modern Slavery Act by Aristocrat Leisure Limited to cover each of the Aristocrat Australian Reporting Entities specified above and covers all seven mandatory criteria for reporting as set out in section 16 of the Australian Modern Slavery Act.

## Aristocrat UK Reporting Entities:

1. Product Madness (UK) Limited

**Legislation:** *Modern Slavery Act 2015* (UK)  
**(UK Modern Slavery Act)**

**Reporting Year:** 1

**Reporting Period:** 1 October 2020 – 30 September 2021

**Type of statement:** mandatory statement

For the purposes of the UK Modern Slavery Act, this Modern Slavery Statement is provided by Product Madness (UK) Limited.

2. Aristocrat Technologies Europe Limited

**Legislation:** UK Modern Slavery Act

**Reporting Year:** 5

**Reporting Period:** 1 October 2020 – 30 September 2021

**Type of statement:** voluntary statement

For the purposes of the UK Modern Slavery Act, this Modern Slavery Statement is provided voluntarily by Aristocrat Technologies Europe Limited (**ATEL**). For Financial Year 2021, ATEL did not meet the threshold for reporting and submitting a statement as required under section 54 of that Act. However, ATEL is providing this Modern Slavery Statement on a voluntary basis to document ATEL's year-on-year progress.







**Neil Chatfield**  
Chairman

## Foreword from The Chairman and CEO

“Good Business, Good Citizen” is a core value shared across Aristocrat’s diverse global operations. This shapes everything we do as a business, including our commitment to ethical sourcing and the prevention of all forms of worker exploitation. We take a zero-tolerance approach to modern slavery and human trafficking, and take very seriously our obligations to identify, mitigate and monitor these risks in our operations and supply chains.

We acknowledge that modern slavery and human trafficking are complex global problems that present risks to all businesses and require ongoing due diligence and continuous improvement to address.

This Modern Slavery Statement (**Statement**) comprises the second report by the Aristocrat Group under the Australian Modern Slavery Act. Since 2017, we have also reported as required under the UK Modern Slavery Act and have also formalised a coordinated, enterprise-wide approach to this issue.

This Statement reflects and describes several recent and ongoing efforts by the Group to identify, mitigate and monitor modern slavery and human trafficking risks, in addition to measures implemented during previous financial years that remain an integral part of our risk mitigation processes.

Aristocrat is committed to ensuring that working conditions in its operations and supply chains are safe, and that all workers are treated with respect and dignity. This means that we also require that our business operations be environmentally responsible and conducted ethically in line with applicable laws, and in a manner that meets community expectations.

We are pleased to report that the Group achieved the key objectives we set for ourselves over this reporting period, as well as implementing a number of further measures. In addition to the ongoing implementation of our existing policies and procedures, as described in more detail in our prior statements and in [Section IV](#) below, key developments in this reporting period include:

- rolling out modern slavery training for all Aristocrat Gaming employees and appropriate Boards of Directors;
- completing a robust survey of key direct Aristocrat Gaming suppliers to identify potential modern slavery risks;
- preparing an Incident Response Guide for any potential modern slavery incidents;
- developing a global modern slavery risk register;





**Trevor Croker**  
Chief Executive Officer  
& Managing Director

- commencing risk assessments for our Pixel United (mobile-first game publishing) business, to identify additional modern slavery risks;
- completing a risk assessment for our VGT business (which is part of Aristocrat Gaming); and
- adding ethical sourcing clauses to key direct supplier agreements and global purchase order terms and conditions for Aristocrat Gaming. These will continue to be added to other key agreement templates in a risk-based manner.

The Group is committed to taking a prioritised, risk-based approach to the development of its modern slavery compliance program. This initially focused on Aristocrat Gaming, which was identified as a potentially higher risk part of our business, and we are pleased to report that we have also started to make progress in respect of identifying and mitigating modern slavery risks within our Pixel United business.

We are satisfied with the improvements we have made in this reporting period, which reflect our cross-functional and multi-disciplinary approach to this important issue. We are in the process of setting ambitious goals for the year ahead and we are committed to long-term change and improving our modern slavery risk management on an ongoing basis.

We would also like to acknowledge and thank our dedicated Modern Slavery Working Group and Project Stakeholder Group, along with all Aristocrat people, for their diligence, engagement and support over the past twelve months. We look forward to achieving more progress in the year ahead.

This Modern Slavery Statement has been approved by the relevant Boards in accordance with the requirements of the Australian Modern Slavery Act and the UK Modern Slavery Act (see [Section IX](#)).

**Neil Chatfield**  
Chairman

**Trevor Croker**  
Chief Executive Officer  
& Managing Director



# I. Who we are: Our structure and business

The Aristocrat Group is a world leader in gaming content and technology, with more than 7,000 employees globally. We are a diverse business united by shared values and an inspiring mission:

**“bringing joy to life through the power of play”.**

## A. OUR STRUCTURE

Aristocrat Leisure Limited (**ALL**) is the ultimate parent company for the Aristocrat Group. ALL is a company incorporated in New South Wales and is listed on the Australian Securities Exchange (ASX: ALL). Each Aristocrat Australian Reporting Entity (other than ALL):

- is incorporated as a proprietary limited company in Australia;
- owns or controls a number of subsidiaries which form part of the Group; and
- is either a direct or indirect subsidiary of ALL.

Aristocrat Technologies Europe Limited (**ATEL**) is incorporated as a limited liability company in the United Kingdom and is an indirect subsidiary of ALL. ATEL has one direct subsidiary, Aristocrat Technologies Spain S.L., which is incorporated in Spain. ATEL is also

registered and operating as a branch in Cyprus under its own name.

Product Madness (UK) Limited (**PML**) is incorporated as a limited liability company in the United Kingdom. PML has four direct subsidiaries: Product Madness Ukraine LLC (incorporated in Ukraine), Playsoft SAS (incorporated in France), Product Madness Israel Limited (incorporated in Israel) and Product Madness España S.L (incorporated in Spain). PML also has one indirect subsidiary, Playsoft sp. z o.o., incorporated in Poland. PML is a direct subsidiary of Aristocrat Technologies Europe (Holdings) Limited, which is incorporated in the United Kingdom and is an indirect subsidiary of ALL.

In this Modern Slavery Statement, we refer collectively to ALL and



its global subsidiaries, including the Aristocrat Australian Reporting Entities, ATEL and PML as **the Group, Aristocrat** (where applicable), **us, our** or **we**.

Not all entities in the Group have reporting obligations. However, because we take an enterprise-wide approach to what we do, all entities in the Group comply with relevant policies and procedures in this space (with limited exceptions, as noted in this Statement).



## B. OUR BUSINESS

The Group has offices and employees located around the world. ALL has its corporate headquarters in North Ryde, Sydney, Australia. Globally, the Group offers a diverse range of products and services including electronic gaming machines, casino management systems and digital social games.





**B. OUR BUSINESS**

**1. Aristocrat Gaming**



Aristocrat Gaming is the world’s number one premium provider of casino games, innovative gaming technology, and customer experience solutions. Operating across three geographic divisions – the Americas, Europe, Middle East and Africa (**EMEA**), and Asia Pacific (**APAC**) – we deliver end-to-end solutions to customers in more than 300 licensed jurisdictions and over 100 countries around the world. Aristocrat Gaming supports every facet of gaming floor operations, from product to sales, systems and service (**Aristocrat Gaming** or **Gaming**). We further strive to lead in the promotion of responsible gameplay, as part of ensuring a vibrant and sustainable industry.

The Group integrates (assembles) machines and systems in Australia, the USA, Macau Special Administrative Region (**SAR**), and the UK via local entities in the Group, including ATEL in the UK and the Aristocrat Australian Reporting Entities in Australia.

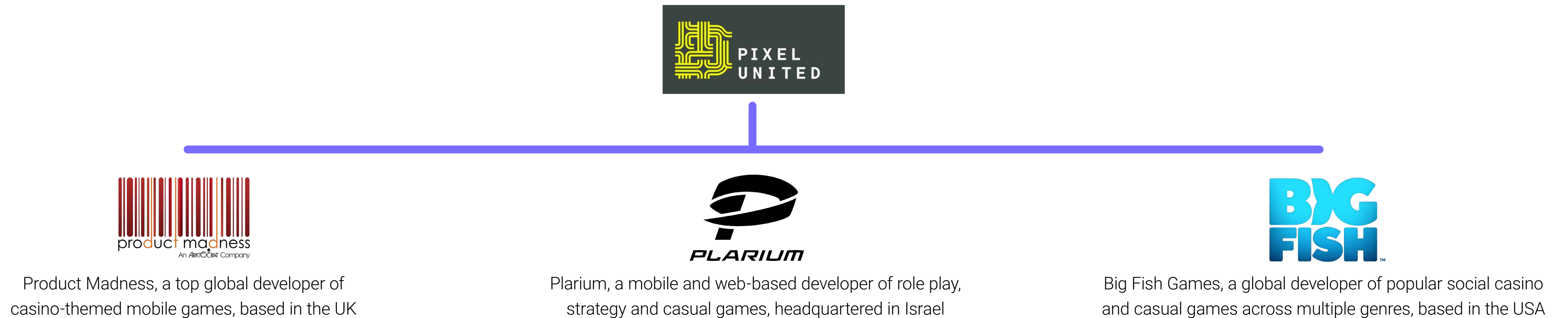
The Group’s Gaming business also includes Video Gaming Technologies Inc. (**VGT**). VGT is a leading developer, integrator and distributor of Class II (bingo-based) casino games in North America, largely to tribal gaming customers.



**2. Pixel United**

Aristocrat also has a globally operating, mobile-first digital games business. This provides free-to-play social casino, role-play, strategy, casual and social games to millions of customers around the world each day. In November 2021, this business was renamed ‘**Pixel United**’ (from Aristocrat Digital). Pixel United continues to be comprised of three key business units:

**Pixel United Structure**





### C. OUR GROUP-WIDE APPROACH TO MODERN SLAVERY COMPLIANCE

While the Group is large, diverse and global, Aristocrat is committed to developing, maintaining, and continually improving a robust, enterprise-wide response to modern slavery. With the limited exceptions noted in this Statement, all entities in the Group are required to comply with our policies and procedures, which may be modified or localised to ensure they are “fit for purpose” based on specific business requirements, local laws and modern slavery risk profiles.





# II. What we do: Our operations and supply chain

## A. OUR OPERATIONS

### 1. Aristocrat Australia

ALL, Aristocrat International Pty Ltd and System 7000 Pty Ltd, which comprise three out of the four Aristocrat Australian Reporting Entities, are all holding companies only and do not carry out operations themselves. Aristocrat Technologies Australia Pty Limited is the only operational entity.

Aristocrat Technologies Australia Pty Limited's principal activities include the integration, marketing and sale of electronic gaming machines and related equipment and services, predominantly in Australia. This includes at our integration facility located in Sydney, Australia for integration and final configuration of electronic gaming machines. Some Aristocrat Australian Reporting Entities also own or control other Group entities which carry out similar activities in different jurisdictions.

Additionally, some Aristocrat Australian Reporting Entities:

- are heavily involved in product design and development at our corporate offices in Sydney; or
- provide back-end functions to other Group entities.

During Financial Year 2021, the Aristocrat Australian Reporting Entities had approximately 980 workers. About 92 per cent were full-time or part-time permanent employees of an Aristocrat Australian Reporting Entity, and the remainder were contingent workers, including temporary, agency or contracted workers. In the same period, about 99 per cent of permanent and contingent workers of the Aristocrat Australian Reporting Entities were based in Australia.

Some Aristocrat Australian Reporting Entities also own, or control Group entities based in other locations which employ workers. The map in [Section I.B](#) provides general information about the locations of our Group workforce.





**A. OUR OPERATIONS**

**2. ATEL**

ATEL's principal activities are the integration, marketing and sale of electronic gaming machines and related equipment and services. ATEL does business in, or has permanent and contingent workforce residing in, the UK, Spain, Cyprus, France, the Netherlands, Germany, Bulgaria, Croatia and South Africa. Its operations do not include Pixel United or VGT.

During Financial Year 2021, ATEL and its subsidiary had approximately 60 workers. Almost 90 percent of the workers were full-time or part-time permanent employees of ATEL and its subsidiary; the remaining workers were contingent workers, including temporary, agency or contracted workers. In the same period, almost 82 per cent of the permanent and contingent workers of ATEL and its subsidiary were based in the UK and Spain.

**3. PML**

PML's principal activities are to provide software development, operational and support services to a related entity, Product Madness, Inc., which is a company incorporated in the USA that publishes social, free-to-play, casino themed games. PML (via its subsidiaries) does business in Ukraine, France, Poland, Israel and Spain.

During Financial Year 2021, PML and its subsidiaries had approximately 495 workers based in the UK, Ukraine, Spain and Israel. More than 80 per cent of the workers were full-time or part-time permanent employees of PML and its subsidiaries; the remaining workers were contingent workers, including temporary, agency or contracted workers. In the same period, more than 90 per cent of the permanent and contingent workers of PML and its subsidiaries were based in the UK and Ukraine.

**4. Charitable giving**

Aristocrat is passionate about supporting the communities within which we live and work and is focused on making a meaningful impact through giving and volunteering activities. We believe that good corporate citizenship is more than just good PR; it is our responsibility. Our corporate community investment programs operate across Aristocrat's global businesses with our employees driving initiatives that all employees can participate in and contribute to. Our charitable giving activities include the donation of goods.

For more information, and details of our community contribution in Financial Year 2021, please see [www.aristocrat.com/sustainability](http://www.aristocrat.com/sustainability).



**As an example of our charitable activities, through AristocratCARES, we are proud to have partnered with the Cupcake Girls since 2019, supporting their events with volunteers. The Cupcake Girls work to provide community education and outreach, advocacy, holistic resources, and referral services for the prevention and aftercare of those affected by sex trafficking. In 2021, we provided financial support which was allocated to the salary of a dedicated therapist to be on staff for victims who are supported by the Cupcake Girls. The Group will continue to investigate and assess current and future charitable opportunities that relate to potential modern slavery victims.**

**B. OUR SUPPLY CHAINS**

**1. Critical products (gaming)**

In the most recent reporting period, approximately 95 percent of our spend for Aristocrat Gaming came from 34 key direct suppliers and 15 managed sub-tier suppliers (**Key Direct Suppliers and Sub-Tier Suppliers**). The 15 identified sub-tier suppliers (also referred to as specified component suppliers) are suppliers of critical sub-tier products where Aristocrat takes full responsibility for the selection, approval and commercial negotiations with those sub-tier suppliers. For their operations and business, ATEL and the applicable Aristocrat Australian Reporting Entities source the components for electronic gaming machines and related equipment from the Group supply chain.

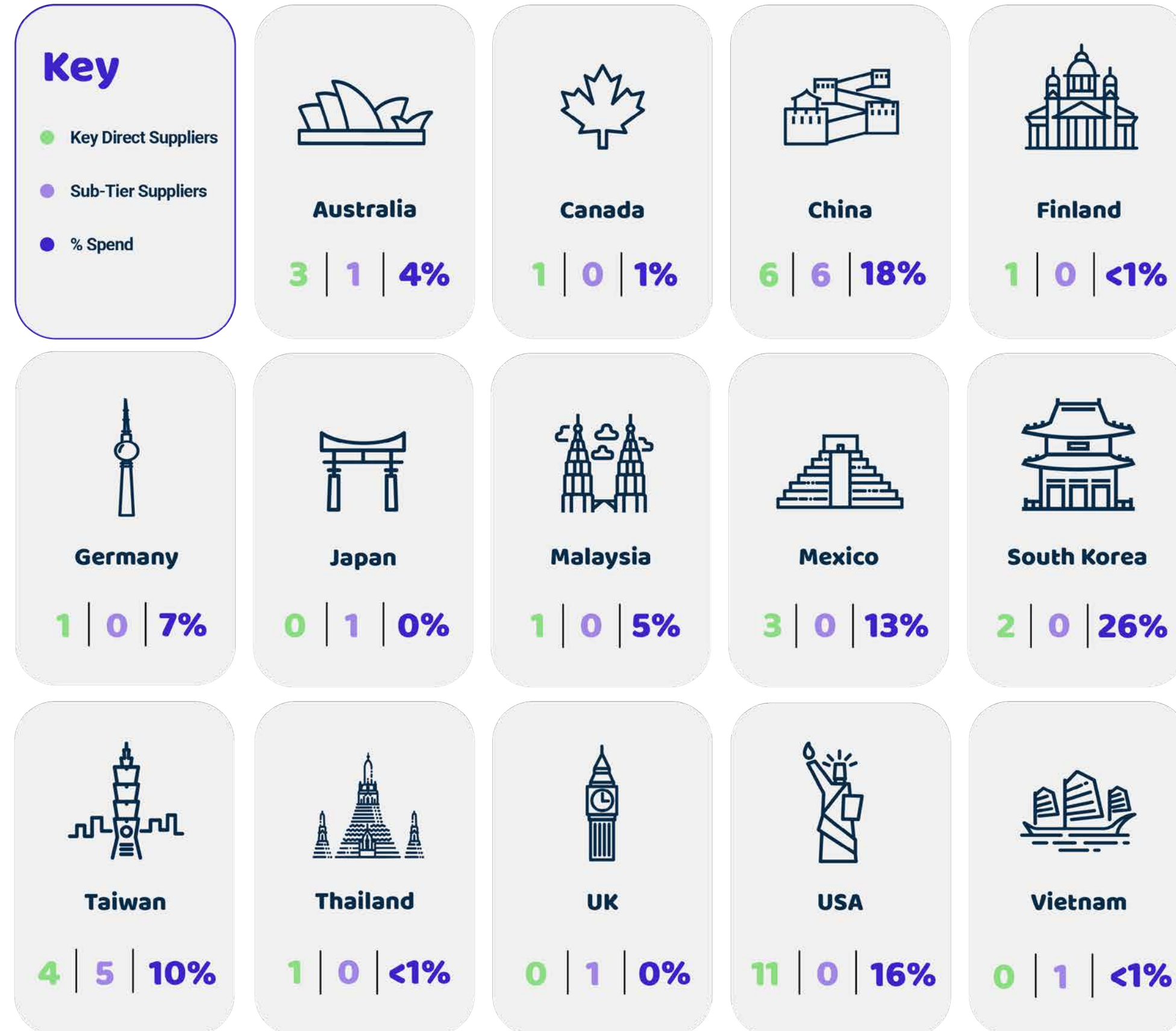
The graphics on the right show the breakdown of Key Direct Suppliers and Sub-Tier Suppliers by location and percentage of spend.

**a. Location of suppliers**

The largest Key Direct Suppliers and Sub-Tier Suppliers by value are located in North America, Australia and East Asia (see graphics on the right which illustrate where our Key Direct Suppliers and Sub-Tier Suppliers are located).

Note: Suppliers have been categorised as sub-tier suppliers if they supply the majority of their products to Aristocrat's direct suppliers and not to Aristocrat. In some cases, the identified sub-tier suppliers may also provide additional products or spare parts directly to Aristocrat. Where '0%' of spend is shown for a sub-tier supplier location in the graphic, this indicates all products supplied by these sub-tier suppliers are supplied to Aristocrat's direct suppliers and all relevant spend is captured at the direct supplier level.

**Key Direct Suppliers and Sub - Tier Suppliers**





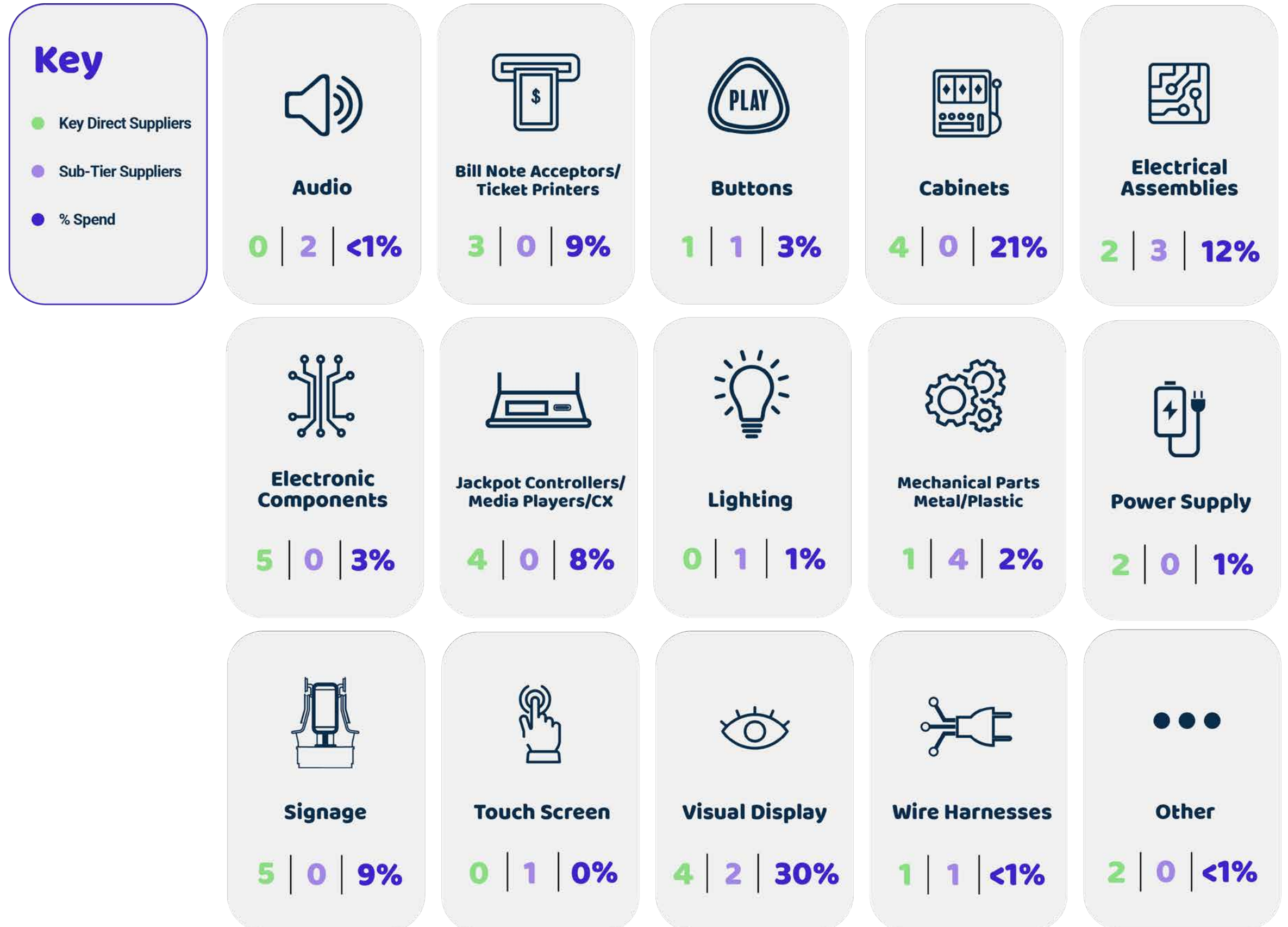
**B. OUR SUPPLY CHAINS**

b. Components

Aristocrat Gaming acquires critical products from the Key Direct Suppliers and Sub-Tier Suppliers, as listed in the categories shown:

Note: Suppliers have been categorised as sub-tier suppliers if they supply the majority of their products to Aristocrat’s direct suppliers and not to Aristocrat. In some cases, the identified sub-tier suppliers may also provide additional products or spare parts directly to Aristocrat. Where ‘0’% of spend is shown for a sub-tier product category in the graphic, this indicates all products supplied by these sub-tier suppliers are supplied to Aristocrat’s direct suppliers and all relevant spend is captured at the direct supplier level.

**Key Direct Suppliers and Sub - Tier Suppliers**



**B. OUR SUPPLY CHAINS**

**2. Pixel United**

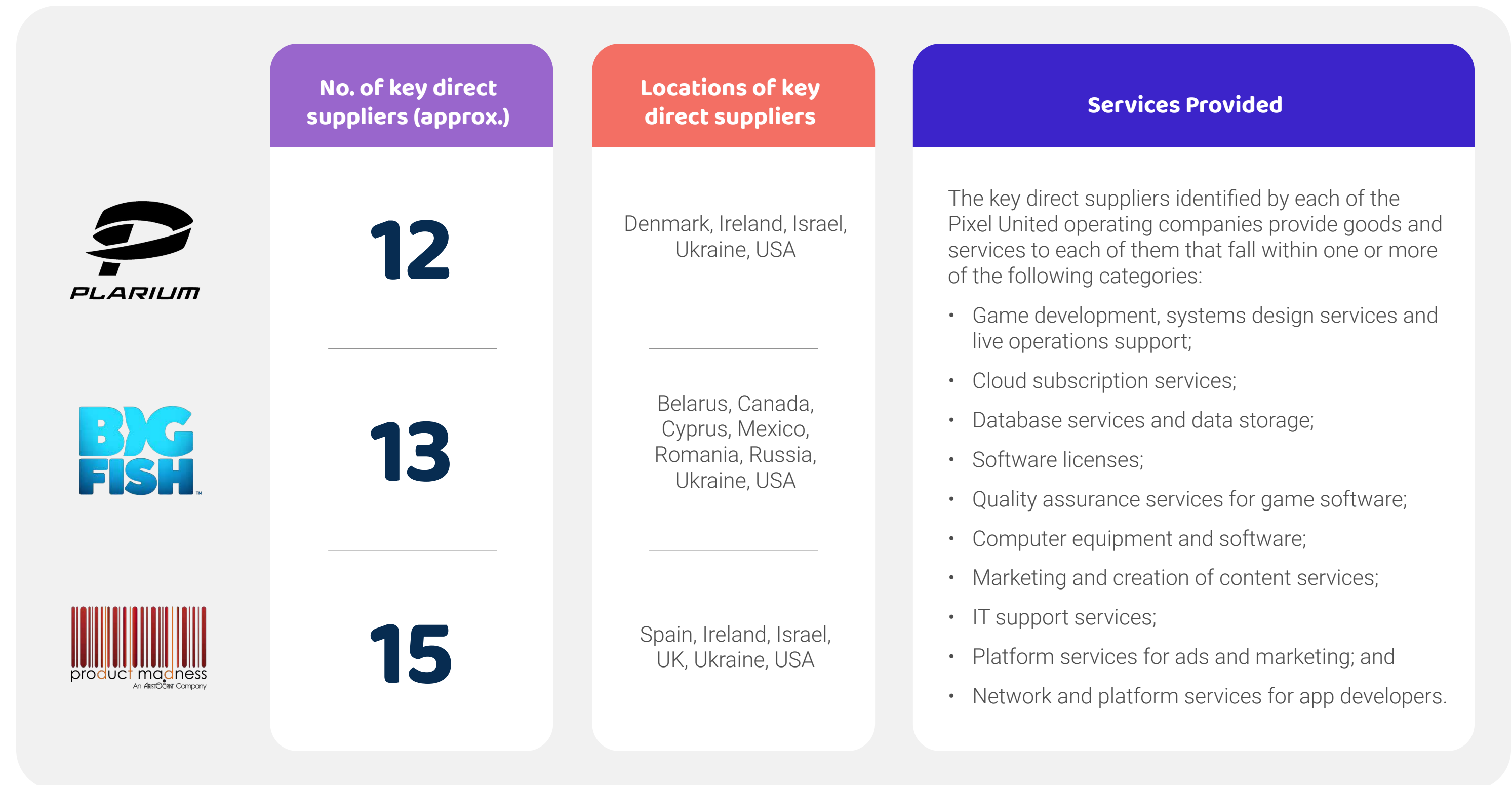
As the core business of Pixel United is digital video game development and marketing, the key direct suppliers to Pixel United are primarily comprised of digital game developers, software developers, IT suppliers and suppliers of related services (such as marketing, sound recording and voiceover services).

**3. Indirect Sourcing**

To support both Aristocrat Gaming and Pixel United, the Group engages a range of other suppliers who supply goods or services that are not integrated or used in our gaming products and digital game development. These are suppliers from whom we purchase goods or services relating to, for example, travel, technology, utilities, facility management, learning and development, marketing, professional services and more (**Indirect Sourcing**).

The Group has commenced its risk assessment work for Indirect Sourcing and more information about our efforts is contained in [Section III.B.](#)

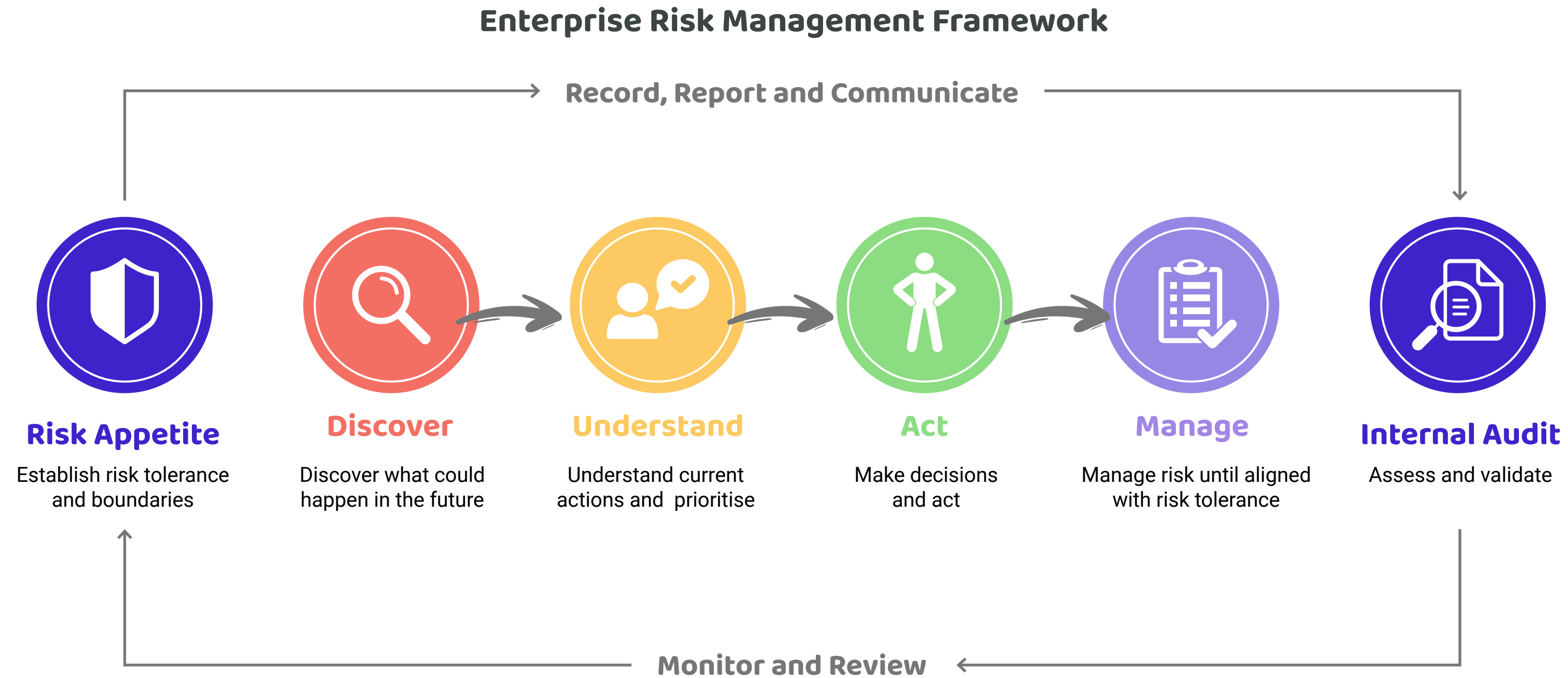
**Pixel United Key Suppliers**





# III. The risks of modern slavery in our operations and supply chains

The Group's Enterprise Risk Management Framework (**the Framework**) supports the timely identification, evaluation, reporting and treatment of material risks so that risks remain within acceptable thresholds as set by the Board of Directors. The Framework encompasses the steps illustrated in the diagram below:





The Group's approach to identifying modern slavery risks in our operations and supply chain is based on three key indicators (which are discussed in further detail in [Section IV](#)):

**1. Industry, sector and product risk indicators:**

We consider the risk that some industries and sectors may be more susceptible to modern slavery, taking into account the composition and location of the workforce. For example, we recognise that risks may be greater in industries and sectors that are heavily reliant on temporary, unskilled, low-paid or migrant workers. We also consider sources such as the US Department of Labor's List of Goods Produced by Child Labor or Forced Labor.

**2. Geographic risk indicators:**

We consider the risk that some countries in which we operate are reported to have a relatively higher prevalence of modern slavery compared to other countries. We base these assessments on the Walk Free 2018 Global Slavery Index (**Global Slavery Index 2018**) and have assigned risk ratings to countries based on that index.

**3. Worker freedom and working condition indicators:**

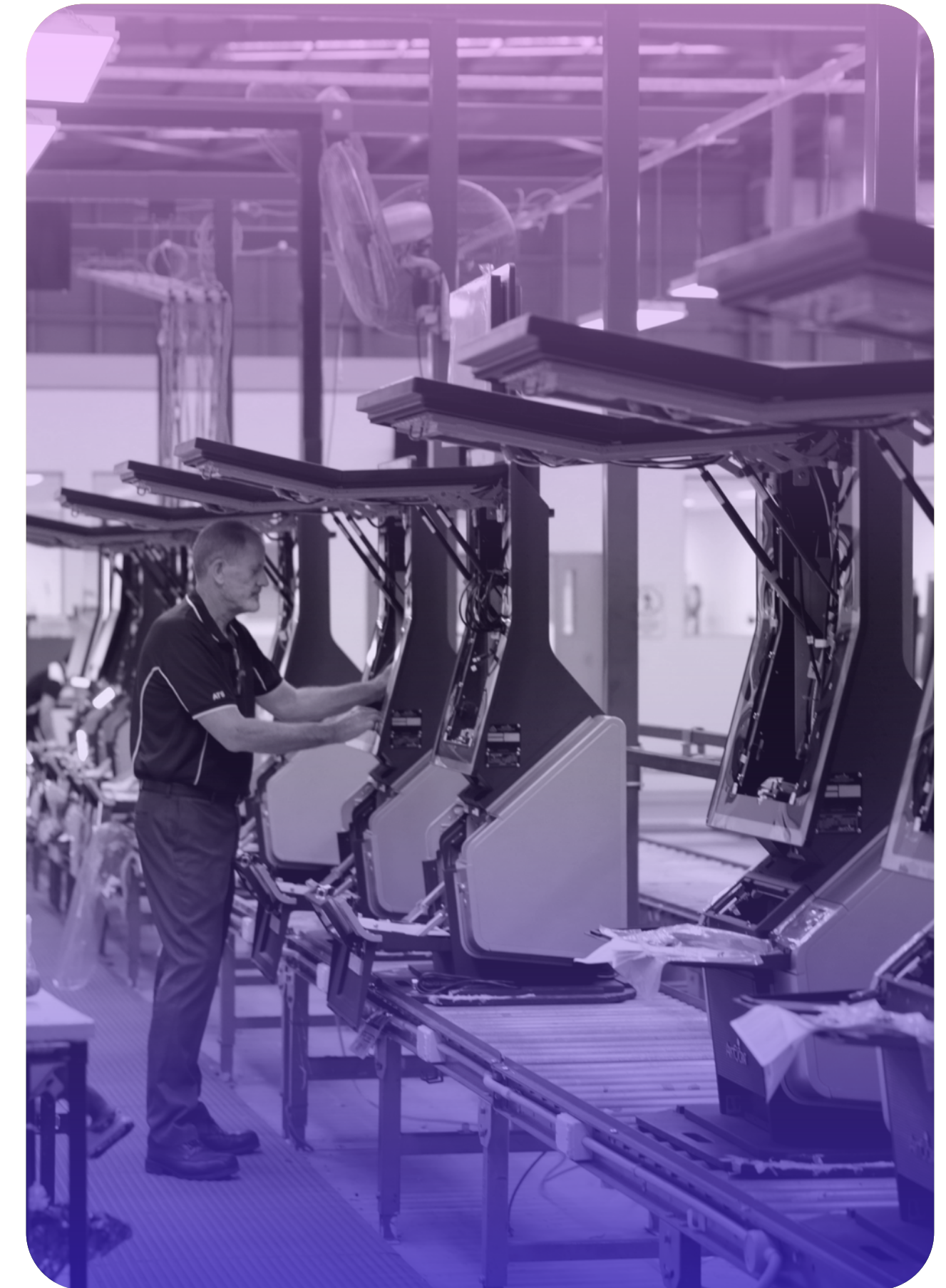
Finally, we consider indicators that workers may not have freedom of movement, including freedom to leave their job, and indicators that working conditions may be poor.

**Aristocrat's Geographic Risk Categorisation**

In summary, countries ranked 1 to 56 on the Global Slavery Index 2018 are treated as relatively higher risk, countries ranked 57 to 111 on the Global Slavery Index 2018 are treated as relatively medium risk, and countries ranked 112 to 167 on the Global Slavery Index 2018 are treated as relatively lower risk.

The likelihood and impact of potential risks identified are assessed using the Group's risk rating tables to determine the significance of each risk. We consider existing controls in place to determine if further mitigating actions are required to bring the risk to within our tolerance level. We describe additional aspects of our approach to addressing potential modern slavery risks in Section IV below.

In Financial Year 2021, we did not identify any specific incidents of modern slavery in our operations or supply chains. However, in the Sections below, we identify the risks of modern slavery practices, meaning the potential for the Group to *cause or contribute to* modern slavery through our operations, or to be *directly linked* to modern slavery through our supply chains, as these concepts are defined in the UN Guiding Principles on Business and Human Rights. Where we have used these terms below, they are italicised.





## A. POTENTIAL RISKS IN OUR OPERATIONS

The Group began a risk assessment process for its own operations during this reporting period. This involved identifying business activities that were not covered by our risk assessment activities in prior years, and the following were identified as areas of focus for detailed risk assessments during Financial Year 2021:

- the Group’s employment practices (including employment of direct/permanent workers and engagement of contractors/temporary workers); and
- charitable donations of goods by the Group.

### 1. Employment of direct / permanent workers

We did not identify any significant risks in connection with the employment of direct/permanent workers nor any potential for the Group to *cause or contribute to* modern slavery risks through its employment practices.

The majority of the Group’s employees are employed in locations that have been identified in the Global Slavery Index 2018 as having a relatively low prevalence of modern slavery, including Canada, New Zealand, Australia, the USA, Argentina, the UK, the European Union, and Mexico. A smaller number of employees are employed in locations with a medium or higher prevalence of modern slavery, such as Ukraine, Poland, Macau SAR and India (but none in the top

20 countries in the Global Slavery Index 2018). We also generally aim for employment terms that are above minimum global contractual standards for all employees, even where those minimum standards may exceed local law requirements. Employee pay is governed by the Aristocrat Global Reward policy that specifies median market pay for local and regional locations.

Within the APAC region, permanent and temporary employees are engaged through either individual contracts or under collective Enterprise Agreements. The Enterprise Agreements set out pay and conditions of employment and the certification process for these Agreements ensures employees are better off overall when compared to the relevant legislated minimum pay and conditions. For employees under individual contracts, we undertake regular reviews to also ensure that their pay and employment conditions are equal to or above the legislative minimums relevant to their classifications. Further, all casual or contract staff will be paid on the same terms as any relevant Aristocrat Enterprise Agreement or in accordance with at least the minimum defined pay rates for their classification.

For all regions other than APAC (including the Americas, India and Europe), we regularly assess and ensure that our employment agreements and practices are compliant with all laws in the applicable jurisdictions.



In 2021, we are pleased to advise that Aristocrat was certified as a Great Place to Work (GPTW) for the first time in Australia and the USA, and also certified in India for the sixth time. GPTW is a global authority on workplace culture, employee experience and leadership. It conducts national recognition programs based on surveys with rigorous methodology and validated employee feedback. To achieve certification, GPTW considered confidential survey feedback provided by employees across Australia, the USA and India, as well as detailed information provided by Aristocrat. The employee survey measured employees’ perceptions of working conditions and the workplace culture, as well their daily workplace experience, to ensure that their leaders (and counterparts) are credible, respectful and fair. The GPTW certification reflects that Aristocrat has high employment standards and working conditions (including provision of a safe working environment, and fair remuneration and leave entitlements), positive employee culture, and adherence by management to honest and ethical business practices.



## A. POTENTIAL RISKS IN OUR OPERATIONS

### 2. Charitable donations

The donation of personal protective equipment (**PPE**) and food packages was identified as an area where the Group could potentially *contribute to* modern slavery risks due to reported concerns about forced labour involving PPE manufacturers in some locations, and the food processing industry's reliance on low-wage, low-skilled workers. During Financial Year 2021, potentially higher risk donations were subject to further review and assessment by the Compliance team, to identify whether the relevant suppliers had been subject to any litigation, enforcement actions or adverse media reports concerning modern slavery issues. The outcome of the internal assessment was that no issues were identified with respect to those specific donations or suppliers.

Further analysis of goods donations by the Group will also be carried out in Financial Year 2022, with a view to identifying any further potential modern slavery risks arising from these activities.

### 3. Engagement of contractors / temporary workers by VGT and Pixel United

Our initial risk assessment work with respect to VGT and Pixel United has focused on the engagement of contractors and temporary workers. This was identified as an area where the Group could

potentially be *directly linked* to modern slavery risks due to the possible lower degree of visibility that employer companies may have in relation to payment arrangements and whether the recruitment agencies are abiding by applicable employment laws (particularly in countries with a relatively higher risk of modern slavery, such as China, the Philippines, Belarus, Russia, Ukraine and Romania). One way in which we are addressing this risk is by the inclusion of specific requirements relating to pay in some of our recruitment agency agreements, with the intention of applying the requirements to the Group's other staffing and similar agreements, as appropriate, in Financial Year 2022 (discussed further in [Section IV.I](#)).

### 4. Further risk assessment

The engagement of contractors/temporary workers in other parts of our business, besides VGT and Pixel United, will be considered in future risk assessments in Financial Year 2022.

We also plan to assess the modern slavery risks in all countries in which we operate in Financial Year 2022.





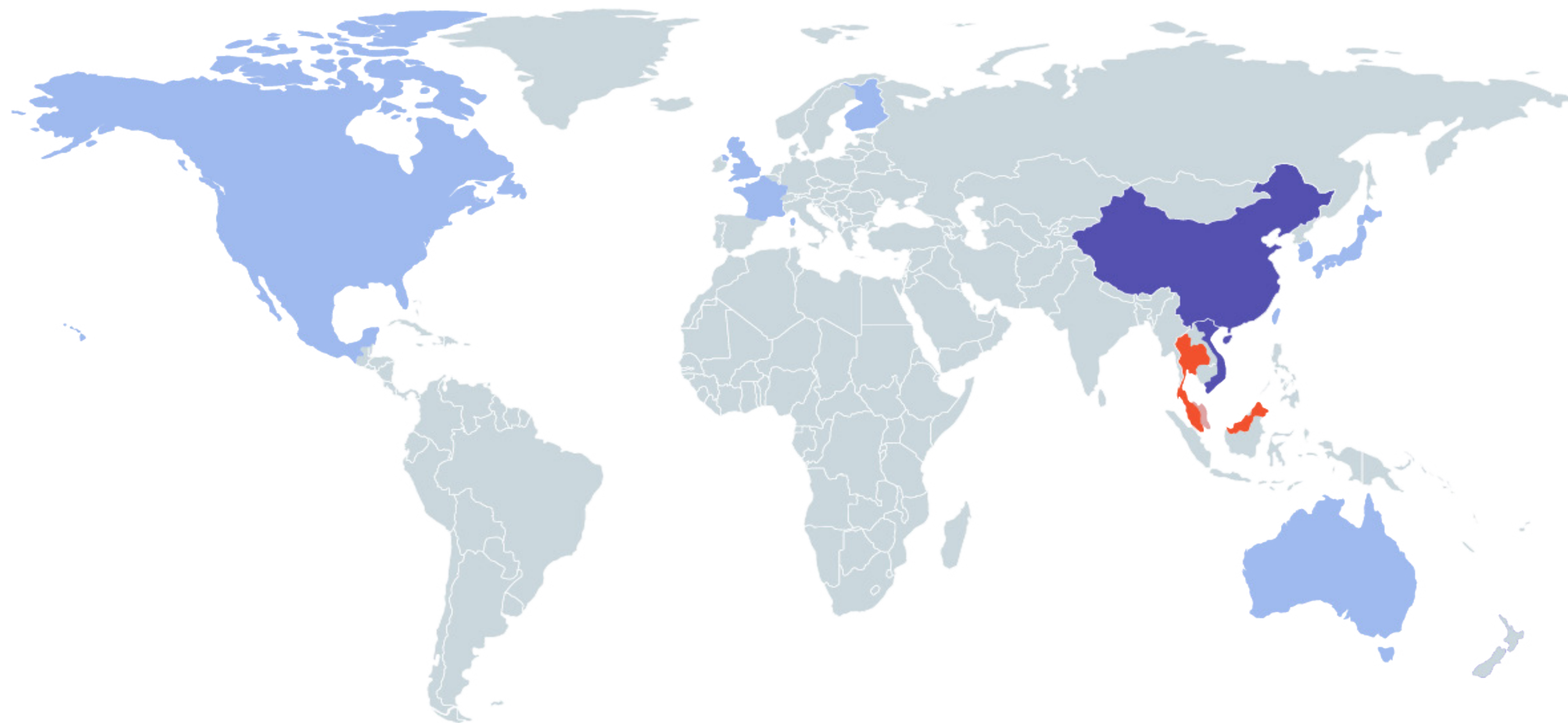
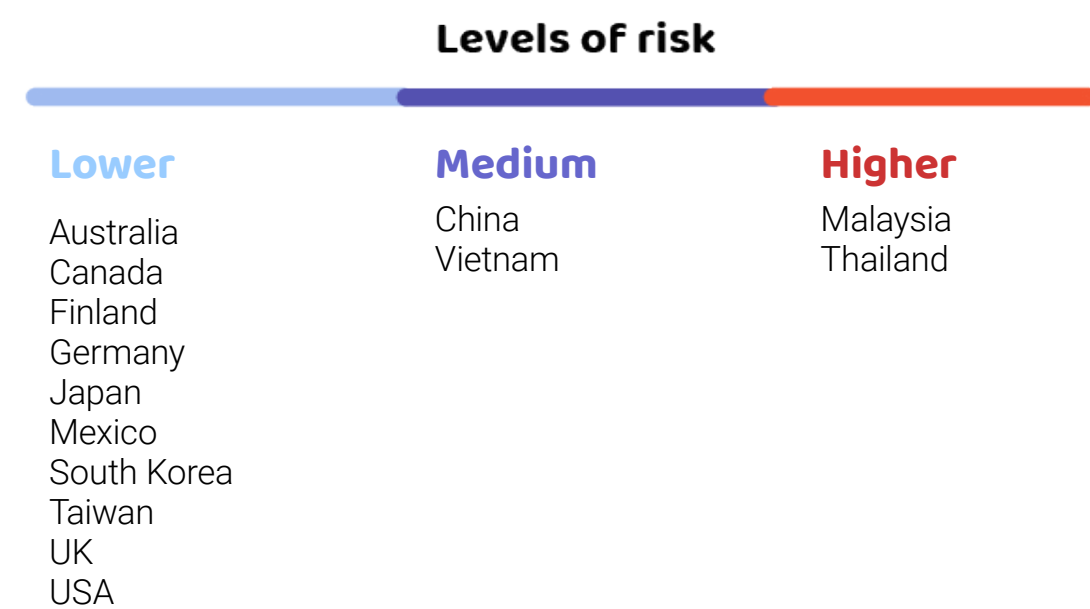
## B. POTENTIAL RISKS IN OUR SUPPLY CHAINS

The following table summarises the areas in our supply chains where the Group could potentially be *directly linked* to modern slavery risks.

Critical products - Gaming	Industry, sector and product risk	Geographic risk	Restricted worker freedoms and poor working conditions
	<ul style="list-style-type: none"> <li>Suppliers of electronic components are potentially higher risk, due to reported forced labour and child labour in electronics factories, particular in some Asian countries.</li> <li>The electronic components sourced by Aristocrat are not included in the Global Slavery Index 2018's category of "electronic components", which includes only consumer electronics such as laptops, computers and mobile phones, while Aristocrat's electronic products are different, being low volume, industry-specific, non-consumer products. However, Aristocrat continues to monitor this sector given the relatively high-risk level associated with "electronic components" generally.</li> </ul>	<ul style="list-style-type: none"> <li>Most Key Direct Suppliers and Sub-Tier Suppliers operate in locations that have the lowest or medium prevalence of modern slavery (see map below).</li> <li>Only a small number of Key Direct Suppliers and Sub-Tier Suppliers operate in higher prevalence locations, but none are located in the top 20 countries that were identified in the Global Slavery Index 2018 as having the highest prevalence of modern slavery.</li> <li>We do not have any Key Direct Suppliers or Sub-Tier Suppliers in the Xinjiang region of China, but we have been closely monitoring forced labour risks in China through our supplier survey (discussed in <a href="#">Section IV.H.(3)</a> below).</li> </ul>	<ul style="list-style-type: none"> <li>We have not identified any specific incidents involving restricted worker freedoms or poor working conditions as part of our supplier survey (discussed in <a href="#">Section IV.H.(3)</a> below).</li> <li>We recognise that some locations in which our Key Direct Suppliers and Sub-Tier Suppliers operate may afford relatively limited legal protections to workers, but one way in which we mitigate this risk (in addition to other mitigation actions discussed in this Statement) is by requiring suppliers to use their best efforts to comply with harmonised minimum standards globally, as set out in our Supplier Code of Conduct (discussed in <a href="#">Section IV.E</a> below).</li> </ul>

### Location of Key Direct Suppliers and Sub-Tier Suppliers



Only a small number of Key Direct Suppliers and Sub-Tier Suppliers are located in higher prevalence locations, but none are located in the top 20 countries in the Global Slavery Index 2018.





## B. POTENTIAL RISKS IN OUR SUPPLY CHAINS

The following table summarises the areas in our supply chains where the Group could potentially be *directly linked* to modern slavery risks.

	Industry, sector and product risk	Geographic risk	Restricted worker freedoms and poor working conditions
<p><b>Plarium and Big Fish</b></p> 	<ul style="list-style-type: none"> <li>Key direct suppliers are primarily digital game/software developers, IT suppliers, and suppliers of related services (e.g., sound recording and voiceover services) (as set out in more detail in <a href="#">Section II.B.(2)</a> above), none of which have been identified as higher risk suppliers.</li> <li>IT suppliers: In relation to IT suppliers, Plarium and Big Fish generally source off-the-shelf technologies from reputable suppliers on standard terms and conditions, so they do not have great leverage to negotiate bespoke modern slavery provisions in supply contracts.</li> <li>Cleaning services: Cleaning services were identified as a potentially higher-risk service, given the relatively lower-skilled, lower-paid nature of the work and the risk of deceptive recruitment and debt bondage in this sector.</li> <li>The assessment identified that cleaning staff are either directly employed by Plarium (pursuant to employment agreements and in accordance with local laws) or, in the case of some Plarium suppliers and all Big Fish suppliers, engaged through a cleaning supplier.</li> <li>Apart from one cleaning supplier in Ukraine (for Plarium), none of the cleaning suppliers engaged by Plarium and Big Fish (either directly or indirectly) are located in higher-risk countries nor any countries having the highest prevalence of modern slavery (based on the top 20 countries in the Global Slavery Index 2018).</li> </ul>	<ul style="list-style-type: none"> <li>Some suppliers are located in relatively higher-risk countries, such as Belarus, Russia, Ukraine and Romania.</li> <li>However, the risk assessment indicated that both Plarium and Big Fish ensure that all their key direct suppliers are engaged via contractual arrangements which include necessary protections and require suppliers to comply with all local laws (including laws relating to employment and working conditions).</li> </ul>	<ul style="list-style-type: none"> <li>Given the services for which these suppliers are engaged (primarily software development and IT-related services), and the contractual standards and protections in place with these suppliers, the Group did not identify any material risks of restricted worker freedoms or poor working conditions which could indicate specific modern slavery risks.</li> </ul>
<p><b>Product Madness</b></p> 	<p>The risk assessment process is ongoing and will be completed in Financial Year 2022. This reflects our risk-based prioritisation of this strand of work, as we have already confirmed that Product Madness does not have any key direct suppliers in higher risk locations, and that all of them supply relatively lower risk products and services (based on the information provided in <a href="#">Section II.B.(2)</a>).</p>		

## B. POTENTIAL RISKS IN OUR SUPPLY CHAINS

In addition to the potential risks outlined above, the Group has conducted a preliminary assessment to evaluate modern slavery risks associated with Indirect Sourcing (to the extent not already addressed with respect to Plarium and Big Fish above), and has identified the following sectors, products and services as areas of focus where the Group could potentially *contribute to* or be *directly linked* to modern slavery risks:

- cleaning services;
- catering/hospitality services;
- construction/maintenance services;
- IT equipment;
- other office equipment (e.g., stationery);
- materials for trade shows and other marketing events (e.g., uniforms, show bags, marketing paraphernalia);
- PPE for workers during the COVID-19 pandemic; and
- warehousing, distribution and transportation services.

The risk assessments for these areas (to the extent not already addressed in this Statement) will be progressed in Financial Year 2022 and beyond in a prioritised manner, while also having regard to the leverage the Group has to influence change.





## IV. The actions we have taken to assess and address modern slavery risks, including due diligence and remediation processes

As set out in Section III above, the Group's approach to identifying modern slavery risks in our operations and supply chain is based on three key indicators. In this Section, we provide further detail regarding our approach to assessing and addressing the identified risks. In summary:

- some of these measures — such as supplier probity checks — are focused on **assessing risks** associated with specific suppliers;
- other measures — such as our new Modern Slavery Incident Response Guide — are focused on **addressing risks** once they have arisen; and
- a small number of measures — such as the supplier survey applicable to Aristocrat Gaming — serve the dual purpose of allowing us to **both assess and address** identified risks.



**A. APPROACH TO ASSESSING AND ADDRESSING RISKS**

Our governance structure and Framework underpin our approach. While the Group is large, diverse and global, we take an enterprise-wide approach to modern slavery compliance. All entities in the Group are required to comply with our policies and procedures in this space (with limited exceptions, as noted in this Statement), which may be modified or localised to ensure they are “fit for purpose” based on specific business requirements, local laws and modern slavery risk profiles. Our Framework is set out in [Section III](#).

The Group has a clear modern slavery compliance road map which is reviewed and updated regularly by our Modern Slavery Working Group (**Working Group**). Our cross-disciplinary Working Group, which is comprised of members from our Global Strategic Sourcing and Legal teams, meets on a regular basis to:

- set the strategy for compliance (which is approved by Aristocrat’s executive teams);
- action, progress and monitor the implementation of the Group’s modern slavery initiatives;
- delegate tasks, set milestones and track our progress; and
- address any potential modern slavery risks with the assistance of relevant business stakeholders.

The Working Group has prepared a charter which governs its conduct and sets out the roles and responsibilities for the Group’s Modern Slavery and Human Trafficking Program. It also defines key stakeholders and the high-level strategy for the successful implementation of the Group’s Modern Slavery and Human Trafficking Program. The objective of the Working Group is set out in the graphic to the right.

**Modern Slavery Governance Structure**

**Board of Directors**

The applicable Boards of Directors provide oversight of the Group’s strategy to address modern slavery, and approve Aristocrat’s annual Modern Slavery Statement under the Australian and UK Modern Slavery laws.

**Audit Committee**

The ALL Board’s Audit Committee, which has oversight of compliance with legal and regulatory (non-gaming) obligations, now reviews the Group’s joint Modern Slavery Statement and once approved by the Committee, recommends it to the ALL Board for approval.

**Executive Steering Committee (ESC)**

The Group’s Modern Slavery and Human Trafficking Program is owned by at least one member of the ESC.

**Modern Slavery Working Group**

The Modern Slavery Working Group has responsibility for the development and implementation of the Group’s Modern Slavery and Human Trafficking Program. The Working Group is led by the SVP of Global Strategic Sourcing and is comprised of members from the Global Strategic Sourcing and Legal teams.

*The objective of the Working Group (as per its Modern Slavery Charter) is to effectively pursue initiatives combating modern slavery that both satisfy Aristocrat’s legal obligations as well as help fulfill Aristocrat’s corporate vision of being a responsible business and good citizen, including through ethical sourcing.*

**Project Stakeholder Group**

The Project Stakeholder Group, which the Modern Slavery Working Group regularly collaborates with, is comprised of stakeholders from across the business and provides input, feedback and approvals to the Modern Slavery Working Group regarding the Group’s modern slavery initiatives.

- |                               |                       |                             |
|-------------------------------|-----------------------|-----------------------------|
| • Group Sustainability        | • Compliance          | • Learning & Development    |
| • Risk & Audit                | • People & Culture    | • Health, Safety & Environ. |
| • Pixel United                | • Company Secretariat | • EMEA Team                 |
| • Gaming Business/VGT         | • Tax & Finance       | • Global Strategic Sourcing |
| • Legal (Internal & External) | • Indirect Sourcing   | • Communications            |



**Good Business, Good Citizen.**



**A. APPROACH TO ASSESSING AND ADDRESSING RISKS**

The Working Group also aligns closely with a group of internal stakeholders who provide feedback and approvals to the Working Group (**Project Stakeholder Group**). The Project Stakeholder Group consists of representatives from different business functions as set out in the graphic above (which includes a non-exhaustive list of stakeholders).

Our Executive Steering Committee (**ESC**) is actively engaged with our modern slavery compliance strategy. The Group’s Modern Slavery and Human Trafficking Program is owned by at least one member of the ESC to ensure that our modern slavery initiatives are implemented from the top and across the whole of our business.

In addition, 100% of our ALL and ATEL Board members and ESC have completed training and participated in awareness raising sessions during the year. Further, the ESC has also been involved in developing and approving key enterprise-wide policies and procedures. Some ESC members have also been actively involved in developing video and other content and materials to promote our staff training and education programs. While our ESC is highly engaged, our modern slavery compliance approach empowers all employees to be involved.

We continue to assess our business to identify key stakeholders

(new and existing) whose participation and collaboration is integral to the Group’s progress in this area. During Financial Year 2021, the Working Group has started to develop the Modern Slavery Stakeholder Engagement Strategy for 2022-2025. The strategy will be tailored to address the different stakeholder groups depending on their awareness, engagement levels and possible impact on the success of the initiatives. The strategy will also aim to set goals and measure the effectiveness of our initiatives in relation to each of the stakeholder groups.

To increase general awareness of modern slavery by all employees, we have already engaged and planned additional varied communications channels for our staff. This includes corporate newsletters, summits, small group discussions, tailored presentations to key stakeholder groups, internal website, global digital employee discussion platforms, global awareness week events and leadership townhalls.

The Working Group also engages external legal experts in Australia and the UK to inform the Group’s approach to modern slavery compliance. Further, the Working Group has benchmarked various aspects of the Group’s program against competitor and other businesses.

**Example of collaboration with Project Stakeholder Group**

The Working Group is currently liaising with a number of Project Stakeholder representatives to embed modern slavery considerations into existing compliance and risk mitigation processes, including for mergers and acquisitions, to bolster the identification and mitigation of modern slavery risks in our operations and supply chains. This consultation will be ongoing in Financial Year 2022 and beyond.

**B. POLICIES**

The Group requires all employees to abide by applicable laws and demonstrate high standards of ethical conduct. Group employees are subject to the [Aristocrat Group Global Employee Handbook and Code of Conduct](#), as well as the Anti-Modern Slavery and Human Trafficking Policy (**Anti-Modern Slavery Policy**). While these materials are implemented on an enterprise-wide basis, they are, in some respects, amended or modified for different parts of the business to ensure they are ‘fit for purpose’ (e.g., to reflect organisational structures and reporting lines in different business segments). Specifically, the Anti-Modern Slavery Policy is in the process of being adapted for the Pixel United business and is expected to be rolled out in early 2022 (as discussed in [Section IV.I](#)).

**The Global Employee Handbook and Code of Conduct:**

- expressly confirms the Group's commitment to ethical sourcing and the prevention of worker exploitation, including the prohibition of modern slavery and human trafficking in its business and global supply chain;
- commits the Group to adhering to all applicable laws that relate to countering modern slavery and human trafficking;
- requires Group employees to refrain from inappropriate, insulting, intimidating, violent, abusive, demeaning or bullying conduct towards others; and
- requires the Group to take all reasonable precautions to provide workplaces that are safe and healthy, such as compliance with all health and safety procedures applicable at Aristocrat workplaces.

**The Anti-Modern Slavery Policy:**

- explains the concepts of modern slavery and human trafficking in layperson's terms, without referring to specific legislative provisions;
- imposes a “zero tolerance” approach for modern slavery and human trafficking within the Group's business and supply chain;
- requires Group directors, officers and employees to report actual or suspected modern slavery and human trafficking to a dedicated email address monitored by key members of the Working Group; and
- identifies several potential indicators of modern slavery and human trafficking to which Group directors, officers and employees should be alert, including restricted freedoms, poor working conditions or accommodation, improper financial arrangements, suspicious behaviours and appearances, and geographic risk factors.

The Anti-Modern Slavery Policy will be reviewed at regular intervals. These reviews will include an assessment and evaluation of its effectiveness, as well as any procedures or practices relating to its implementation. More frequent reviews may be conducted if merited by changes in legal or regulatory requirements, or emerging best practices for ethical sourcing. In Financial Year 2022 and beyond, we will also be reviewing Group policies more broadly, to ensure that modern slavery risk management is considered in broader aspects of the organisation.



### C. TRAINING AND RAISING AWARENESS

Aristocrat has implemented general modern slavery awareness training for all Aristocrat Gaming employees globally and the ALL and ATEL Boards. This training is also included as part of mandatory training for all newly onboarded Gaming employees.

Over the past year, modern slavery training has also been tailored for the Pixel United staff, with roll out due to commence in the first quarter of the 2022 calendar year.

Additionally, we are in the process of creating supplementary modern slavery training packages for roll out in Financial Year 2022 which

are tailored for specific groups within the business that might have greater exposure to modern slavery risks in their day-to-day activities, namely supplier-facing staff and key People & Culture staff. This supplementary training will be rolled out closer to the lifting of COVID-19 travel restrictions (which prevented in-person supplier interactions during Financial Year 2021).

Senior management within Aristocrat has provided positive feedback on the efforts made to raise awareness of modern slavery issues and how to escalate concerns should any arise.

### D. EMPLOYEE REPORTING SERVICE AND GRIEVANCE MECHANISM

Aristocrat recognises the importance of having reporting and grievance mechanisms as a way for people to safely raise concerns. As at this Statement's publication date, Aristocrat has not received any reports of critical modern slavery incidents through our various reporting channels that: (a) present a risk to the life, physical or mental wellbeing, or freedom of workers; or (b) involve a material breach of mandatory requirements under applicable laws or regulations. However, we are encouraged by the fact that, since training has been implemented, we have received queries relating to modern slavery risks, as well as some reports of potential modern slavery incidents that were investigated and resolved without any critical issues being identified.

Aristocrat continues to maintain confidential telephone and website reporting services that provide a channel for employees to anonymously and confidentially report potential misconduct, including breaches of Group policies and procedures, discriminatory treatment, harassment and bullying, workplace safety standards, and other types of improper behaviour. Employees can report:

- to a dedicated email address for reporting actual or suspected modern slavery incidents monitored by key members of the Working Group. This email address is communicated to employees in the Anti-Modern Slavery Policy and the Modern Slavery Incident Response Guide (see [Section IV.G](#) below), as well as via the modern slavery training; and

#### A senior leader in Aristocrat's Gaming business in the EMEA region said:



It was wonderful to have a member of the Working Group present to the EMEA team at our recent Town Hall meeting. The presentation provided context and awareness to the team about Aristocrat's approach to modern slavery risks, both within our operations and our supply chain. My team and I now better understand what risk indicators to watch for within our business and how to escalate potential incidents of modern slavery.



- through Aristocrat's Whistleblower Program, which can be accessed either through the dedicated hotline or web intake site, which are available 24 hours a day, 365 days a year. This confidential, independent communication service is provided by a third-party ethics and compliance specialist. The Whistleblower Program is communicated to employees through the Global Employee Handbook and Code of Conduct and mandatory Compliance Certification training. All details of the Whistleblower Program, including relevant contact information, are made readily available to employees on Aristocrat's intranet.

**E. SUPPLIER CODE OF CONDUCT**

Our [Supplier Code of Conduct](#) articulates the Group’s expectations for suppliers and contracted sub-tier suppliers with respect to modern slavery and human trafficking, as well as several other labour, health and safety, and environmental standards. Our Supplier Code of Conduct places obligations on our suppliers based on the Australian Modern Slavery Act and the UK Modern Slavery Act, the Responsible Business Alliance Code of Conduct and other international standards. Suppliers are required to adhere to the principles set out in the Supplier Code of Conduct and Aristocrat will assess a supplier’s performance and commitment to compliance when making sourcing decisions, including the selection, retention, and remediation of issues with suppliers. In most instances, our

preference will be to support suppliers to improve their standards over a reasonable period, rather than to terminate supplier relationships. At all times, our response to non-compliance will consider the best interests of workers who may be the victims of poor working conditions.

In several respects, the Supplier Code of Conduct requires suppliers to exceed minimum local legal standards, and required them to commit to using their best efforts to meet several aspirational standards (such as maximum working hours and compliance with industry standards relating to wages and benefits) by 31 December 2021. Due to the ongoing COVID-19 pandemic and travel restrictions, the suppliers’ responses to the Group’s expectations in the Supplier

Code of Conduct have not been validated on-site, however this work will resume once travel is deemed safe.

A review of our Supplier Code of Conduct was completed early in Financial Year 2022. We have made some enhancements to the Supplier Code of Conduct to further emphasise the importance of our suppliers managing modern slavery risks in their supply chains including the expectation to pass-through obligations to their sub-tier suppliers where practical. The updated Supplier Code of Conduct is scheduled to be published in the March quarter of 2022.



**F. SUPPLIER PROBITY CHECKS**

As part of our standard compliance procedures and onboarding process, a probity check is required for all new and current suppliers with which Aristocrat expects to spend above a specific monetary threshold in any calendar year. This probity check is done for any Aristocrat Gaming and Indirect Sourcing suppliers for the Gaming business above that threshold. Specific checks relating to modern slavery have been added to the probity checks which are conducted by our Compliance team, which seek to identify any litigation, enforcement actions or adverse media reports relating to modern slavery issues. The modern slavery checks assess publicly available information through a third-party compliance and risk database to determine whether the supplier has raised any material concerns with respect to modern slavery issues.

The  shows actions that have been newly implemented in Financial Year 2021





## G. MODERN SLAVERY INCIDENT RESPONSE GUIDE

In Financial Year 2021, the Group developed a Modern Slavery Incident Response Guide (**the Incident Response Guide**) to ensure that it is prepared to respond if it becomes aware of any actual or suspected modern slavery incidents. The Incident Response Guide:

- assigns responsibility for coordinating the response to an actual or suspected modern slavery incident, and for notifying and consulting other relevant Group staff, taking a whole-of-Group approach and involving all stakeholders up to and including the Board; and
- includes guidance regarding the investigation and remediation of actual or suspected modern slavery incidents within the Group's operations and supply chain.

### The Group's Approach to Remediation

The Group's approach to remediation of modern slavery risks is based on four key principles, which reflect best practice guidance issued by the Australian Government, the UK Government and non-governmental organisations:

- remediation actions should consider the best interests of actual or suspected victims;
- remediation actions should be designed to prevent ongoing harm, and to provide redress for past harm;
- wherever possible, remediation actions should be collaborative; and
- where lessons can be learned from specific incidents, we seek to share best practices within our own operations and, where appropriate, implement any improvements within our supply chain.

The Incident Response Guide is intended to be published in Financial Year 2022, and the Group intends to integrate it with the Group's overarching incident response and business resilience framework. The Group also intends to run a modern slavery incident simulation in 2022 to further educate and prepare the Group for a response that is consistent with the principles outlined above.



The  shows actions that have been newly implemented in Financial Year 2021

## H. ADDITIONAL MEASURES FOR ARISTOCRAT GAMING

### 1. Supplier due diligence

Engaging and working with our Aristocrat Gaming suppliers is key to our modern slavery compliance program. Our goal is to work with suppliers to improve conditions through communication, monitoring and follow-up assessments, and we place an obligation on suppliers to cooperate with us to identify and mitigate sourcing risks and remediate potential modern slavery issues in their supply chains.

In addition to the supplier probity checks described above, the Global Strategic Sourcing (**GSS**) team (which sits within our broader Global Supply Chain team) conducts supplier due diligence in a risk-based manner for key Gaming suppliers. This supplier due diligence assessment takes the form of a supplier self-assessment and covers a range of topics including:

- supplier capability and production capacity;
- quality;
- environmental, social and governance issues;
- workplace health and safety; and
- financial health (completed by a third party).

It also includes suppliers' verification of compliance with Aristocrat's standard sourcing policies. Where required, we request validation of the information provided through supporting information. The format of this supplier due diligence assessment has been updated in Financial Year 2021 to include more targeted questions regarding modern slavery and human trafficking. The Global Strategic Sourcing team is also governed by the Group's Supplier Due Diligence Procedure which targets Key Direct Suppliers and Sub-Tier Suppliers and encourages regular due diligence assessments by the suppliers, which Aristocrat Gaming aims to undertake every 24 months.

### 2. Ethical sourcing provisions for suppliers

To ensure our standards are met, and with a view to continuously improve the way we work with our suppliers, in 2019 we began updating our Key Direct Supplier and Sub-Tier Supplier contracts to require suppliers to comply with all applicable modern slavery, human rights, conflict minerals and related laws. Contracts have been updated on a priority basis, with supplier criticality and contract duration being key considerations.

In Financial Year 2021, we completed our update of these ethical sourcing provisions in all template master supply agreements for our Key Direct Suppliers and Sub-Tier Suppliers.

In relation to our existing master supply agreements with Key Direct Suppliers and Sub-Tier Suppliers, a new agreement or a variation to the existing agreement was signed to include the ethical sourcing clauses. Please see Section V below for information on our considerable progress with updating existing supplier agreements.

Separately, by early Financial Year 2022 we also updated our global purchase order terms and conditions (which are utilised globally for a wide variety of day-to-day transactions by the business) to include our ethical sourcing clauses.

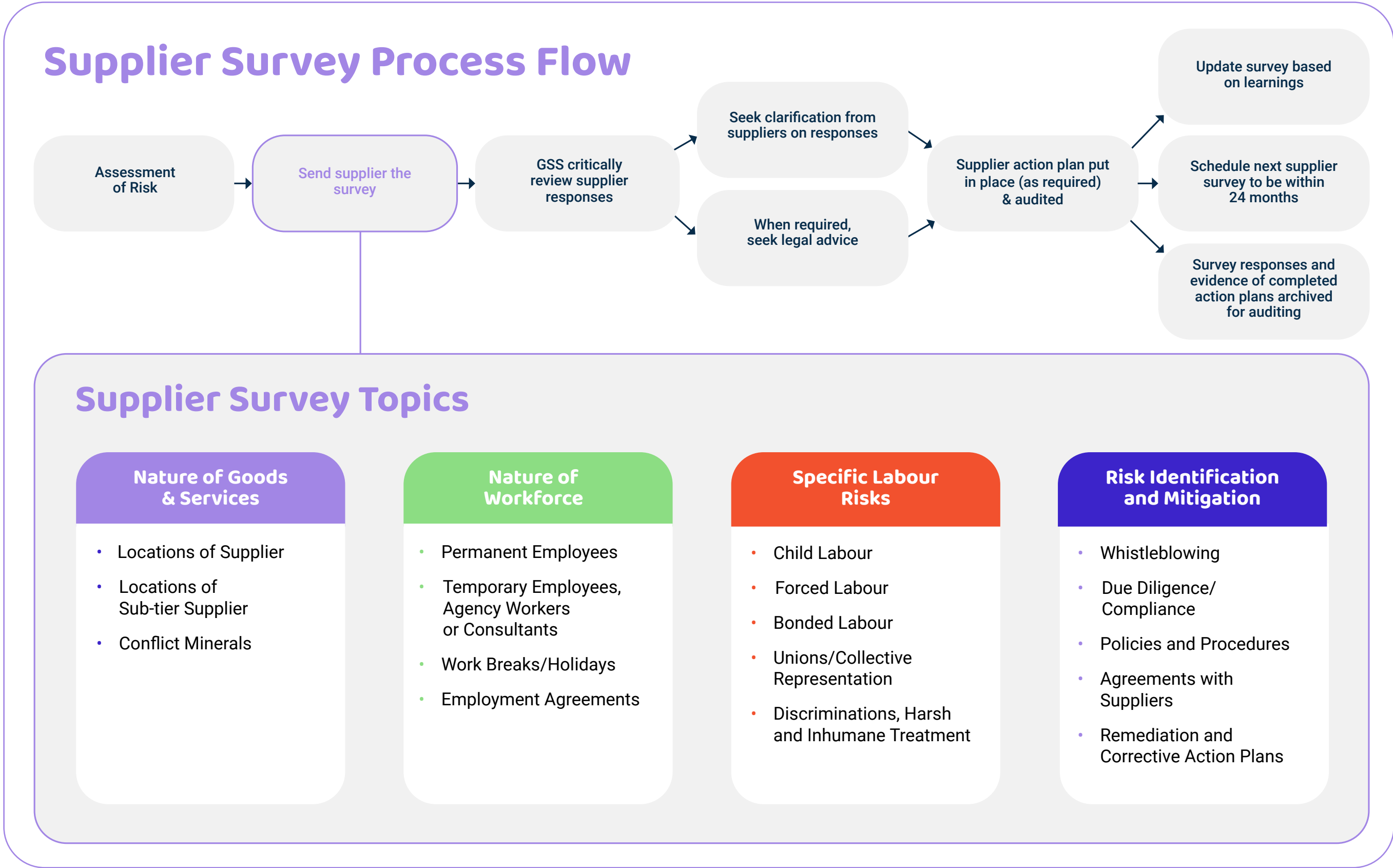
In Financial Year 2022, we plan to continue to update our other agreements (for Aristocrat Gaming and Pixel United) in a risk-based manner, to incorporate our ethical sourcing clauses further. This will involve collaborating with the businesses and tailoring the clauses to suit the businesses and types of agreements in question. This work has already commenced in Financial Year 2021 in relation to the Pixel United agreements and global Gaming intellectual property licence agreements.



## H. ADDITIONAL MEASURES FOR ARISTOCRAT GAMING

### 3. Supplier Survey

The Supplier Survey has been used as a tool not only to identify risks within our supply chain, but also to understand those risks and how best to mitigate them. The Supplier Survey requests suppliers to respond to more than 80 detailed questions targeted specifically at addressing modern slavery issues, to allow Aristocrat to understand how each supplier manages and responds to each of the below topics:



As part of our continual improvement process, in Financial Year 2021, the Working Group reviewed the Supplier Survey and incorporated new questions to further understand:

- steps taken by suppliers to ensure issues can be reported by their workers;
- specific actions suppliers’ employees can take if they have experienced modern slavery; threats of abuse, verbal abuse, discrimination, violation of employment standards or similar issues;
- whether suppliers’ employees can report issues in their own language;
- whether suppliers’ employees can report issues anonymously;
- how suppliers ensure adherence to their company standards and are fully compliant with local laws; and
- steps suppliers would take if their own suppliers (i.e. sub-tier suppliers to Aristocrat) were found to be non-compliant with modern slavery laws.

## H. ADDITIONAL MEASURES FOR ARISTOCRAT GAMING

As noted in prior years, while implementing the Supplier Survey, the Group has had regard to the emerging risks concerning the use of Uyghur forced labour in Xinjiang and other regions of China. Considering these emerging risks, Aristocrat Gaming has updated its Supplier Survey to include further questions to ascertain:

- whether any goods supplied to the Group, or any raw materials or components used in those goods, are directly or indirectly sourced, processed, manufactured, packaged or distributed in the Xinjiang region or other regions of China in which forced or compulsory Uyghur labour may be used; and
- if so, what steps suppliers are taking, if any, to ensure that those goods, raw materials, or components are not sourced, processed, manufactured, packaged or distributed in reliance on forced or compulsory Uyghur labour, including prison labour.

Once responses are received from the supplier, they are critically reviewed for completeness. Clarifications are sought for responses that are incomplete, vague or unclear. Evidence to support supplier policies and processes related to modern slavery compliance (as well as copies of the policies and processes themselves) are requested for verification in all cases. For example, validations are requested for employee age and working rights, including any contracted labour through employment agencies.

The Group has now completed the Supplier Survey review of all the 49 Key Direct Suppliers and Sub-Tier Suppliers of gaming components which were spread across a total of five tranches of work over Financial Years 2020 and 2021.

- Financial Year 2020 – The Group took (and continues to take) a risk-based approach to the implementation of the Supplier Survey. The first tranches of the Supplier Survey, which the Group started to implement in Financial Year 2020, included suppliers that primarily manufacture or source critical components in medium or higher-risk countries such as China, Thailand, Malaysia and Vietnam.
- Financial Year 2021 – The tranches completed in Financial Year 2021 have focused on suppliers that primarily manufacture or source critical components in relatively lower-risk countries or regions such as Australia, Taiwan, South Korea, Mexico, Europe and North America.
- Financial Year 2022 – An additional tranche of the Supplier Survey will continue into Financial Year 2022 and will include VGT suppliers that have not already been included in any of the earlier tranches.

**Aristocrat has received positive feedback from its suppliers in relation to the Supplier Survey, including the following quote from a senior executive at one of Aristocrat’s European suppliers:**



It is great to be working with a company like Aristocrat whose values align with our own, working on the prevention, identification and remediation of modern slavery risks in their supply chain. Aristocrat ensured we have our own anti-modern slavery and human trafficking policies in place, that there are methods to anonymously report any suspected incidents, and have created open channels of communication across leadership to continue improving our community’s approach to this issue. We welcome the resumption of on-site visits and audits by the Aristocrat team to confirm compliance to these important initiatives.





**H. ADDITIONAL MEASURES FOR ARISTOCRAT GAMING**

**4. Supplier visits and audits**

Aristocrat’s Global Supply Chain management team conducts periodic supplier visits and audits to monitor suppliers. The purpose of the supplier visits is to monitor matters identified in the supplier due diligence assessment, the Modern Slavery Supplier Survey and the Supplier Business Reviews (SBRs) as discussed further below. Such audits are conducted in a risk-based manner, with a focus on the major key direct suppliers that account for most of the Group’s business.

Prior to the COVID-19 pandemic, these audits were conducted on-site. The ongoing pandemic and related travel restrictions have prevented the supplier audit visits since March 2020. While supplier audits were paused, our Global Strategic Sourcing team considered engaging with third-party on-site auditors. Third-party auditing is reviewed regularly by the Working Group in consultation with our Global Strategic Sourcing and Risk teams as part of our risk controls, and we will continue to assess the need for third party auditors in the future based on the assessment of risk. Further, the team intends to resume the regular program of on-site visits when government guidance allows, and travel restrictions are lifted. In the meantime, the Working Group and other stakeholders regularly assess the approach to auditing in lieu of site visits, including remote engagements with suppliers.

**CASE STUDY**

When on-site visiting a supplier in Shenzhen, China prior to the COVID-19 pandemic, our Global Strategic Sourcing team had concerns that some workers looked younger than the legal age for employment. Global Strategic Sourcing management discussed this with the supplier’s executives to express their concerns and formally verified all workers were over the minimum legal age to be in full-time employment. The risk of child labour will continue to be monitored by the Global Strategic Sourcing team for all suppliers.

The Global Strategic Sourcing team has included a section specific to modern slavery in our SBRs. These reviews are conducted with Key Direct Suppliers and Sub-Tier Suppliers in accordance with our internal Supplier Business Review Procedure. The purpose of the SBRs is to provide a forum for Aristocrat and the key strategic suppliers to discuss and share information on business performance, trends, issues, risks, initiatives and other topics as directed by either party.



**H. ADDITIONAL MEASURES FOR ARISTOCRAT GAMING**



**5. Guidance regarding supplier interactions on modern slavery issues**

In Financial Year 2021, the Group developed a guidance document for supplier interactions related to modern slavery issues during audits and site visits. This document provides best practice guidance to supplier-facing staff who attend supplier sites on how to interact with suppliers if potential modern slavery issues are identified during an audit or site visit. The primary focus of the guidance document is to ensure that suspected modern slavery issues can be raised and addressed promptly and safely with suppliers in a manner that keeps potential victims of modern slavery safe from harm. The Group will publish this guidance document for key supplier-facing staff who conduct supplier audits in Financial Year 2022 and before on-site audits or site visits resume.

In addition, key members of Aristocrat’s Global Supply Chain and Design and Development teams who are supplier facing will also be receiving additional customised supplementary training to assist with identifying potential modern slavery indicators as further discussed in [Section IV.C](#).

An excerpt from our “Guidance for Supplier Interactions” document regarding modern slavery during supplier audits is included below. The “SOS Hand Signal” mentioned in the excerpt has also been published in Aristocrat’s global internal newsletter to all employees. We plan to continue raising awareness of the hand signal both internally and throughout our supply chain.

**CASE STUDY**

During a supplier audit, you see a worker make the “SOS Hand Signal”. Detecting victims, who are often ‘hidden in plain sight’, is a particular challenge as victims are often unable to communicate easily for reasons including being under threat and intimidation in the workplace, and/or may not speak English as a first language. This one-handed sign can silently be used to indicate that they need help and want someone to check in with them in a safe way. In these circumstances, you should report the incident as set out in the Anti-Modern Slavery and Human Trafficking Policy.



**1. PALM OUT**



**2. TUCK THUMB**



**3. TRAP THUMB**

The  shows actions that have been newly implemented in Financial Year 2021



## I. ADDITIONAL MEASURES FOR PIXEL UNITED, VGT AND INDIRECT SOURCING

As part of our ongoing risk assessment for Pixel United, VGT and Indirect Sourcing, the Group has been assessing whether the risk mitigation measures implemented for our global Aristocrat Gaming supply chains – including due diligence requirements and ethical sourcing provisions previously discussed in [Sections IV.H.\(1\)](#) and [IV.H.\(2\)](#) – can also be applied to address any modern slavery risks in the Pixel United, VGT and Indirect Sourcing supply chains, taking into account any differences in the risk profiles and business requirements.

VGT has been able to adopt the majority of the key initiatives to address modern slavery risks (including the Anti-Modern Slavery Policy, modern slavery staff training and Modern Slavery Supplier Survey), while the Pixel United business has required some changes to the mitigation measures to ensure applicability to their businesses. Specifically, following extensive consultation with all the Pixel United businesses and leadership teams, bespoke amendments were made to the Anti-Modern Slavery Policy and the staff training for the Pixel United businesses, to align with the operations and expectations of those businesses. A dedicated point of contact has also been set up for the reporting of modern slavery incidents by Pixel United staff which has been integrated with the existing Group reporting measures. Collaboration with Pixel United is ongoing in relation to other mitigation measures and will continue into Financial Year 2022.

Additionally, VGT has taken steps to address the modern slavery risks associated with engagement of temporary workers or contractors who are paid indirectly via recruitment agencies by updating its template staffing agreements to require agencies to: (a) pay wages without deduction (except as required by law), and (b) give VGT access to the agency’s records to enable VGT to verify that workers are being paid accordingly. These contractual amendments are also intended to be applied in the Group’s other staffing and similar agreements, including Pixel United agreements as appropriate, and this work will continue in Financial Year 2022 and beyond.

For Indirect Sourcing, in Financial Year 2022, Aristocrat plans to:

- enhance the maturity of our Indirect Sourcing systems by implementing a policy to more accurately capture our indirect suppliers’ spend in a centralised manner. This work to centralise and increase governance will enhance our ability to identify, assess and remediate the risks of modern slavery in our Indirect Sourcing; and
- implement modern slavery questions in future supplier selection and due diligence processes involving material indirect suppliers, by developing multiple targeted questionnaires to be utilised in a risk-based manner considering the suppliers, the commodity and the location of the product or service.



# V. Assessing the effectiveness of our actions to assess and address modern slavery risks

In Financial Year 2021, the Working Group (in consultation with a variety of relevant stakeholders as set out in [Section IV.A](#)) has assessed the effectiveness of Aristocrat's approach to mitigating modern slavery and human trafficking risks based on the key performance indicators (**KPIs**) below, which were first set out in 2019, and which were tied to specific objectives for the early years of the modern slavery compliance program. The effectiveness of our actions is assessed against the KPIs on an annual basis.

## Modern Slavery KPIs

Key objective	Key performance indicator	Summary of performance
<p><b>Employee training and awareness.</b></p> <p><i>Although Aristocrat has a longstanding sustainability and supply chain compliance program, the Group did not have a lengthy track record of dealing with modern slavery issues specifically. Accordingly, the effectiveness of our program depended on raising awareness of the key concepts of modern slavery and human trafficking.</i></p>	<p>The percentage of Group employees, including those in supplier-facing roles, who have received training regarding the Anti-Modern Slavery Policy.</p>	<ul style="list-style-type: none"> <li>To date, approximately 4000 employees (95% of all Aristocrat Gaming employees and 100% of ALL and ATEL Board members) have completed the company's general modern slavery training and assessment questionnaire.</li> <li>Within Aristocrat Gaming, 100% of supplier-facing staff have completed the general modern slavery training.</li> <li>New Aristocrat Gaming employees are required to complete the general modern slavery training within 90 days of commencing employment.</li> <li>Qualitative feedback has been obtained from employees in relation to training provided (see next page).</li> </ul>
<p><b>Consistent application of the Supplier Code of Conduct and the ethical sourcing contractual safeguards.</b></p> <p><i>Until recently, Aristocrat's suppliers were not subject to any specific ethical sourcing obligations, so the introduction of new contractual provisions served three purposes: raising awareness of modern slavery and human trafficking among suppliers, setting the Group's expectations regarding these issues, and providing mechanisms for the Group to monitor suppliers and address any concerns regarding standards violations.</i></p>	<p>The percentage of the Group's key direct suppliers that are signatories to the ethical sourcing contractual safeguards or otherwise subject to the Supplier Code of Conduct.</p>	<ul style="list-style-type: none"> <li>To date, approximately 95% of our contracted Key Direct Suppliers and Sub-Tier Suppliers have agreed to incorporate ethical sourcing clauses in their agreements and to be subject to the Supplier Code of Conduct. We plan to address any additional key direct VGT supplier agreements in the next Financial Year.</li> <li>As part of our due diligence process, we are continually and actively communicating with suppliers regarding our requirements and monitoring their compliance with our agreements.</li> <li>Gaming suppliers are provided with an electronic copy of the Group's Supplier Code of Conduct upon signing an agreement with Aristocrat.</li> <li>A hyperlink to the Supplier Code of Conduct is also included in our purchase order terms and conditions (as discussed in <a href="#">Section IV.H.(2)</a>). Recent updates to the agreement templates have included obligations for suppliers to comply with the Supplier Code of Conduct (more details on the Supplier Code of Conduct are in <a href="#">Section IV.E</a>).</li> <li>Progress in this space in relation to the Pixel United business is continuing, as discussed in <a href="#">Section IV.H.(2)</a>.</li> </ul>
<p><b>Prompt remediation of critical incidents.</b></p> <p><i>For these purposes, critical incidents are defined to include incidents involving our operations or our direct suppliers that: (a) present a risk to the life, physical or mental wellbeing, or freedom of workers; or (b) involve a material breach of mandatory requirements under applicable laws or regulations.</i></p>	<p>The percentage of the Group's key direct suppliers with one or more critical issues incidents during the financial year that remediated their respective critical issues incidents within two weeks or less.</p>	<ul style="list-style-type: none"> <li>As noted in <a href="#">Sections III</a> and <a href="#">IV.D</a>, the Group did not identify any specific incidents of modern slavery in our operations or supply chain in Financial Year 2021, including no critical issues.</li> <li>As discussed in <a href="#">Section IV.D</a>, the Group has received queries and reports relating to potential modern slavery issues.</li> </ul>



As well as the quantitative assessment of its performance against the KPIs listed on the previous page, Aristocrat has also sought qualitative feedback on the effectiveness of its modern slavery training. Comments have been positive.

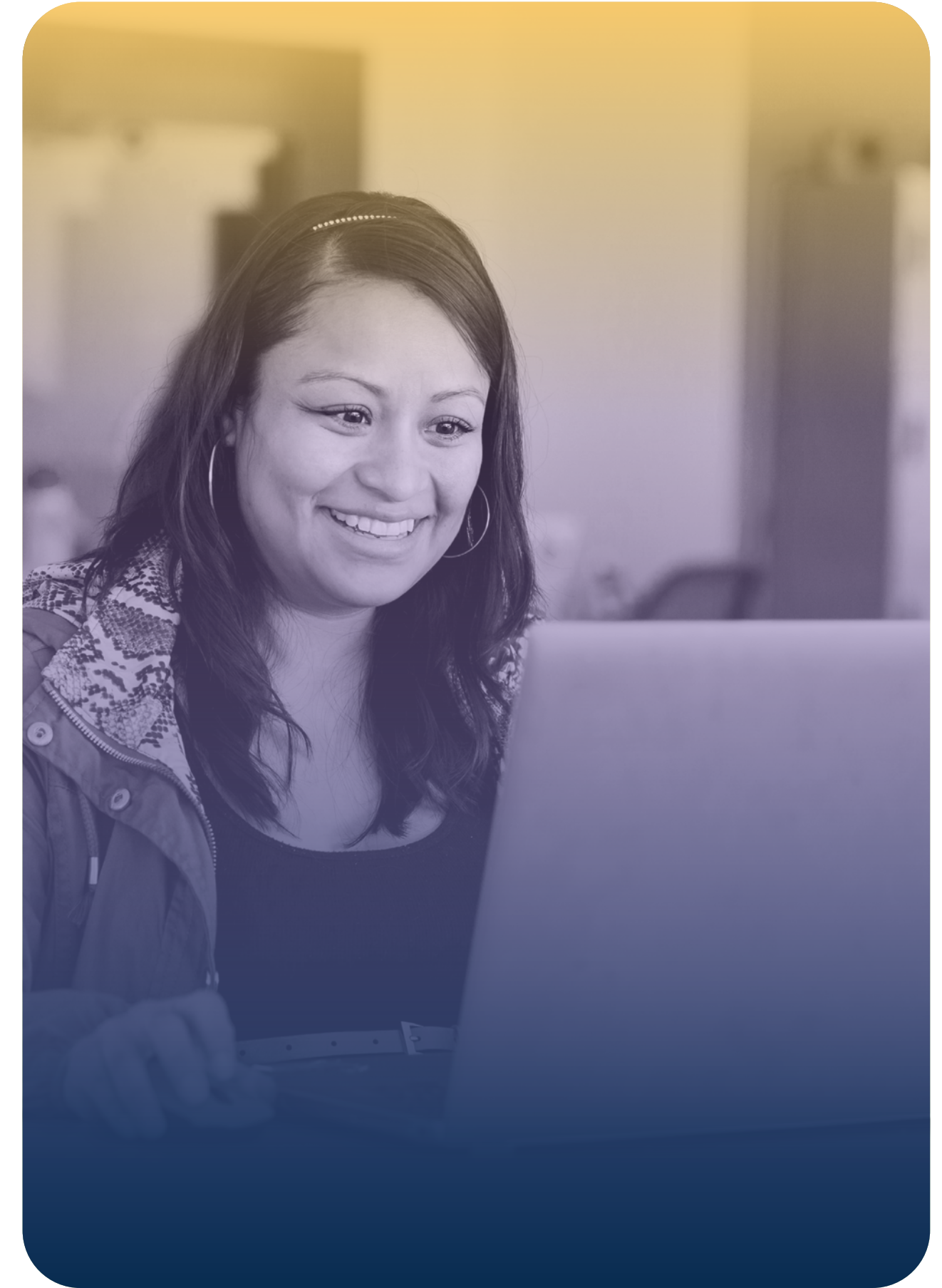
**Aristocrat received the following feedback from an employee:**

“

I found the modern slavery training to be very user friendly, accessible and in an easy-to-follow format. The content itself was informative; shedding light on the many forms of slavery which still exist today. The training brought awareness to forms of modern slavery, such as 'debt bondage', which previously might not have been associated with the word 'slavery'.

”

Aristocrat continues to periodically review the KPIs listed on the previous page to determine whether they continue to represent appropriate criteria for measuring the effectiveness of Aristocrat's efforts to mitigate modern slavery and human trafficking risks. Aristocrat will also consider the appropriateness of additional KPIs that align with and progress our modern slavery action plan (for example, an additional KPI relating to supplier audits to build on the considerable work that has been undertaken in relation to supplier surveys, as set out in [Section IV.H.\(3\)](#)). For Financial Year 2022, one objective is to increase knowledge fluency among employees with direct responsibility for dealing with modern slavery issues, through further training and education. Aristocrat therefore intends to expand its KPIs to reflect this core objective in the next reporting cycle.





## VI. Consultation

In accordance with the Australian Modern Slavery Act and relevant government guidance on consultation, we developed this joint Modern Slavery Statement in consultation with each of the Aristocrat Australian Reporting Entities and all entities which are owned or controlled by those Aristocrat Australian Reporting Entities.

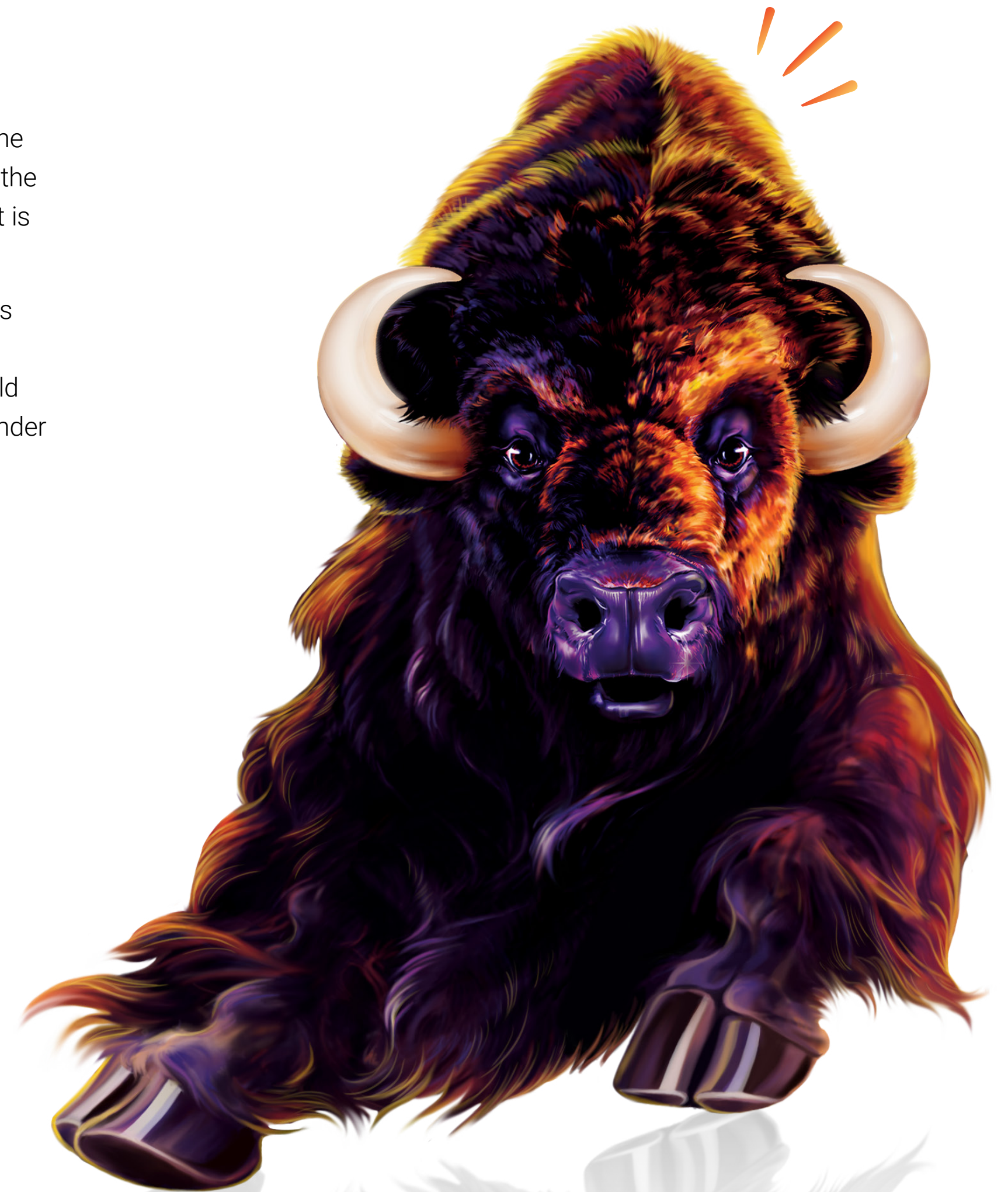
The consultation process involved initial threshold assessments to determine which entities have reporting obligations under the Australian Modern Slavery Act or the UK Modern Slavery Act, consideration of how modern slavery risks vary across the Group, implementation of a Group-wide risk assessment process which is being rolled out as outlined in [Sections III](#) and [IV](#), and ongoing agreement on our future road map for the next reporting period as further described in [Section VII.C](#).

Aristocrat also separately consulted with the wider Group. This included tailored communication with Pixel United, recognising that the risk profile of Pixel United is likely to be different to the risk profile of other Aristocrat Gaming business segments. Our stakeholder engagement

process is discussed in further detail in [Section IV.A](#) above.

To ensure a robust consultation across the Group, members of the Project Stakeholder Group are also required to provide input into the development of the Statement and sign-off before the Statement is provided to the relevant Boards for final approval and signing.

Our Working Group has worked with modern slavery legal experts in both the UK and Australia, which helped to develop and refine our approach, and to ensure that we conducted an initial threshold assessment to identify entities that have a reporting obligation under the Australian Modern Slavery Act or UK Modern Slavery Act.





## VII. Other important information

### A. ENGAGEMENT, COLLABORATION AND STATEMENT ENHANCEMENTS

In Financial Year 2021, in addition to our Group consultation process, Aristocrat has taken steps to engage with regulatory and research bodies, as well as other companies, to inform and further enhance our approach to modern slavery compliance.

We have engaged with Monash University and the Australian Council of Superannuation Investors in relation to their reports on the first cycle of Australian modern slavery statements to better understand how Aristocrat scored in these reports and to identify ways to enhance future modern slavery statements. Because of this engagement, this Statement includes several enhancements compared to prior years, including:

- additional detail about our Group's operations and supply chains (as discussed in [Section II](#));
- additional detail about the Group's approach to identify modern slavery risks, and the potential risks that have been identified (see [Section III](#));
- additional detail about the effectiveness of the actions taken by the Group to address these risks (see [Section V](#));
- case studies ([Section IV.H.\(4\)](#), [Section IV.H.\(5\)](#)); and
- information about our engagement and collaboration with industry and peers on modern slavery issues during Financial Year 2021 (see above in this Section).

We also connected with a prominent Australian company in a further effort to collaborate and enhance the Group's future initiatives and

leverage learning from other companies that are subject to the same reporting regime.

In anticipation of further engagement in Financial Year 2022 and beyond, we have developed internal guidelines to provide a framework for third-party engagement and to facilitate collaboration that is beneficial for all parties involved. We look forward to further engagement and collaboration, including with our suppliers, to enhance our visibility of what our peers are doing to address modern slavery issues, keep up to date with 'best practice' as it continues to evolve, and identify opportunities for improvement in our own practices and initiatives.

### B. GOVERNMENT RESOURCES AND KEY DEVELOPMENTS

Aristocrat welcomes guidance issued by the Australian and UK Governments in respect of compliance with the Australian Modern Slavery Act and the UK Modern Slavery Act, respectively. We have used this guidance, where appropriate, to help draft this Statement and inform our approach. The Group periodically reviews changes and developments in modern slavery and human trafficking laws and relevant guidance issued by governments and others.

### C. RELEVANT MATTERS IMPACTING OUR BUSINESS

The ongoing COVID-19 pandemic continues to have an impact on our business, but we have adapted our approach to ensure that we remain able to identify and mitigate modern slavery risks. For example, opportunities for travel to conduct supplier audits have been limited due to international restrictions and, as a result, we have been in more regular virtual contact with our suppliers. As set out in last year's statement, this has included asking questions about the well-being of workers. In addition, since the pandemic started, we have arranged payment of suppliers where we asked them to hold inventory, so that they would remain able to pay their workers. Although the emergence of global supply chain shortages in 2021 has been a key priority and taken significant management attention, we have continued to make progress on our modern slavery road map and met our most important objectives. We also have a plan to complete any delayed tasks over the next reporting cycle (as set out in detail elsewhere in this Statement).

### D. LOOKING AHEAD – OUR FUTURE ROADMAP

Aristocrat is currently developing its road map for further enhancements to the modern slavery compliance program in Financial Year 2022, in consultation with all divisions of the Group. Aristocrat currently intends to focus on the following themes:

- ongoing risk assessment and increasing risk maturity, to ensure that policies, procedures and risk mitigation measures remain risk-based and fit-for-purpose across our global operations and supply chain, and to address emerging areas of risk;
- enhanced engagement and collaboration with suppliers, to ensure that suppliers fully understand our standards and expectations; and
- improving the knowledge fluency and skills of employees who are responsible for responding to actual or suspected modern slavery incidents, to ensure that we have a consistent approach that reflects the best practice principles set out in our new Incident Response Guide.





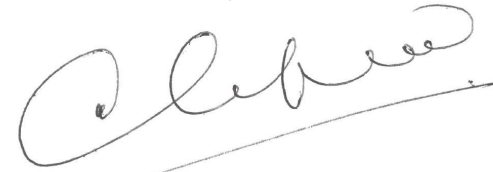
## VIII. Addressing mandatory criteria

The table below helps illustrate where you can find the criteria for the Australian Modern Slavery Act and the UK Modern Slavery Act addressed in this Statement.

Section in Modern Slavery Statement	Australian Modern Slavery Act	UK Modern Slavery Act
Page iii.	A statement must identify the reporting entity (section 16(1)(a))	
<a href="#">Section I</a> (Who we are: our structure and business) and <a href="#">Section II</a> (What we do: our operations and supply chain)	A statement must describe the structure, operations and supply chains of the reporting entity (section 16(1)(b))	A statement may include information about the organisation's structure, its business and its supply chain (section 54(5)(a))
<a href="#">Section III</a> (The risks of modern slavery in our operations and supply chains)	A statement must describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls (section 16(1)(c))	A statement may include information about the parts of the organisation's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk (section 54(5)(d))
<a href="#">Section IV</a> (The actions taken by us to assess and address these risks, including due diligence and remediation processes)	A statement must describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes (section 16(1)(d))	A statement may include information about the organisation's policies in relation to slavery and human trafficking (section 54(5)(b)), the organisation's due diligence processes in relation to slavery and human trafficking in its business and supply chains (section 54(5)(c)), and about the training available to its staff (section 54(5)(f))
<a href="#">Section V</a> (Assessing the effectiveness of our actions)	A statement must describe how the reporting entity assesses the effectiveness of such actions (section 16(1)(e))	A statement may include information about the organisation's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate (section 54(5)(e))
<a href="#">Section VI</a> (Our consultation process)	A statement must describe the process of consultation with any entities that the reporting entity owns or controls; and in the case of a reporting entity covered by a statement under section 14—the entity giving the statement (section 16(1)(f))	
<a href="#">Section VII</a> (Other Important Information)	A statement must include any other information that the reporting entity, or the entity giving the statement, considers relevant (section 16(1)(g))	
<a href="#">Section IX</a> (Approval and signing)	For a joint modern slavery statement, the joint modern slavery statement must be approved and signed in accordance with one of the options set out in (section 14(2))	For bodies corporate, a statement must be approved by the board of directors and signed by a director (section 54(6)(a))

## IX. Approval and signing

In accordance with section 14 of the Modern Slavery Act 2018 (Cth), this joint Modern Slavery Statement for Aristocrat Leisure Limited, Aristocrat International Pty Ltd, Aristocrat Technologies Australia Pty Limited and System 7000 Pty Ltd was approved by the Board of Aristocrat Leisure Limited as the parent entity on 23 February 2022, and the Board has delegated authority to Neil Chatfield, Chairman, and Trevor Croker, CEO and Managing Director, to jointly sign this joint Modern Slavery Statement on behalf of Aristocrat Leisure Limited:



Signature

**Neil Chatfield**

Chairman

23 February 2022

Date



Signature

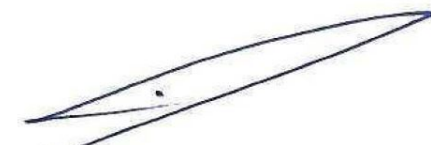
**Trevor Croker**

CEO and Managing Director

23 February 2022

Date

In accordance with section 54 of the Modern Slavery Act 2015 (UK), this Modern Slavery Statement was approved by the Board of Product Madness (UK) Limited effective 23 February 2022, and the Board has authorised Yoav Ecker, a director of the board, to sign this Modern Slavery Statement on behalf of Product Madness (UK) Limited:



Signature

**Yoav Ecker**

Managing Director

23 February 2022

Date

In accordance with section 54 of the Modern Slavery Act 2015 (UK), this Modern Slavery Statement was approved by the Board of Aristocrat Technologies Europe Limited effective 23 February 2022, and the Board has authorised Craig Toner, a director of the board, to sign this Modern Slavery Statement on behalf of Aristocrat Technologies Europe Limited:



Signature

**Craig Toner**

CFO and EVP Operations

23 February 2022

Date



The image features a blurred background of a casino floor with slot machines. The scene is dimly lit, with a color gradient from green on the left to purple on the right. In the center, the Aristocrat logo is displayed in white, consisting of the word "ARISTOCRAT" in a serif font with a stylized "O" containing a dot above it. Below the logo, the website address "www.aristocrat.com" is written in a smaller, sans-serif font.

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