



MODERN  
SLAVERY  
STATEMENT  
FY2021

THE  STAR  
ENTERTAINMENT GROUP





Queen's Wharf Brisbane. Concept image only. © Destination Brisbane 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 Pyrmont on which our corporate office is currently based, the Gadigal people of the Eora Nation.

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



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

### ABOUT THIS STATEMENT

This statement, pursuant to the Australian Modern Slavery Act 2018 (Cth) ("the 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 2020 – 30 June 2021. 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 CEO and Managing Director.

Cover image: Artist impression of the Dorsett hotel and The Star Residences tower. © Destination Gold Coast Consortium.

## CONTENTS

<b>03</b>	<b>A MESSAGE FROM OUR CEO</b>
<b>04</b>	<b>INTRODUCTION</b>
<b>05</b>	<b>REPORTING ENTITY – THE STAR ENTERTAINMENT GROUP</b>
<b>06</b>	<b>OPERATIONS AND SUPPLY CHAIN</b>
<b>07</b>	<b>RISKS OF MODERN SLAVERY</b>
<b>08</b>	<b>RISK BASED DUE DILIGENCE</b>
<b>11</b>	<b>GOVERNING POLICIES AND STRATEGIES</b>
<b>14</b>	<b>MEASURING EFFECTIVENESS</b>
<b>15</b>	<b>CONSULTATION WITH ENTITIES OWNED OR CONTROLLED</b>
<b>16</b>	<b>OUTCOMES AND FUTURE PLANS</b>





# A MESSAGE FROM OUR CEO

*Our vision, to be Australia's leading integrated resort company, is guided by our core values of 'Ownership,' 'True Teamwork,' 'Welcoming' and 'Do The Right Thing' which are embedded across every facet of how we operate as a business.*

Upholding human rights is fundamental to 'Doing the Right Thing' and underpins all that we do for our people, our guests, our partners and our communities.

We are committed to working in partnership with our team members, suppliers and other stakeholders to understand and address the issues of modern slavery so that together, we can respect and support the rights of all people, regardless of where they may live or work.

In our second Modern Slavery Statement, in addition to providing details of our operations and supply chain, we have built upon our progress in identifying modern slavery risks as well as our commitments, activities and measurements of effectiveness for the reporting period.

Yours sincerely

A handwritten signature in black ink that reads "Matt Bekier".

**Matt Bekier**  
**Managing Director and Chief Executive Officer**  
**The Star Entertainment Group**



Artist impression of towers under construction at The Star Gold Coast.  
© Destination Gold Coast Consortium.



Queen's Wharf Brisbane. Concept image only. © Destination Brisbane Consortium.

# INTRODUCTION

The Star supports the United Nations Guiding Principles on Business and Human Rights (“UN Guiding Principles”) and we expect our suppliers to respect all human rights, including labour rights, throughout their business activities. We recognise the need for continued, increasing effort and stakeholder collaboration to achieve this shared goal.

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.

It is a confronting reality that even in the present day, men, women and children all over the world remain victims of modern slavery. According to the Global Slavery Index there are an estimated 40 million people trapped in modern slavery worldwide, including 15,000 in Australia. An estimated 24.9 million are in forced labour globally and women and girls are disproportionately vulnerable to modern slavery, accounting for 71% of all victims.

Freedom from slavery is a fundamental human right and The Star is committed to taking action to prevent, mitigate and address modern slavery risks within our operations and supply chain.

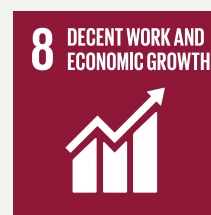
## UNITED NATIONS SUSTAINABLE DEVELOPMENT GOALS

The Star takes a broad view of sustainability and focuses on building business capacity and delivering continuous improvement in the management of Environmental, Social and Governance (ESG) issues.

The Star’s sustainability strategy, is built on a four-pillar framework which supports the organisations business plan. The four pillars are:

- **Leading Company:** The Star is an ethical corporate citizen leading the way on responsible gaming and maintaining strong relationships with our stakeholders
- **World Class Properties:** The Star develops and operates world class liveable, environmentally sustainable and resilient integrated resorts and precincts
- **Guest Wellbeing:** The Star is committed to giving our guests a safe, secure and comfortable experience
- **Talented Teams:** The Star attracts, develops and retains a talented, diverse and engaged team

The Star uses the Sustainable Development Goals (SDGs) as a guide and roadmap toward 2030 to better understand how our ESG strategies and programs contribute to the global Agenda for Sustainable Development.



Our commitments to understanding and addressing modern slavery risks within our operations and supply chain relate to ‘Target 8’ of the SDGs which is the promotion of decent work and economic growth, and directly to ‘Target 8.7’ which aims to “take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking (by 2030) and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.”

# REPORTING ENTITY – THE STAR ENTERTAINMENT GROUP

The Star is an ASX 100 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 partners Chow Tai Fook Enterprises and Far East Consortium Limited (JV Partners) are delivering a \$3.6 billion redevelopment of Queen’s Wharf in Brisbane. Expected to open in 2023, Queen’s Wharf Brisbane will deliver transformational impacts on Queensland jobs, training and tourism, both domestic and international.

The Star has also entered into further joint venture agreements with JV Partners to expand and improve the value proposition of our properties in Sydney and the Gold Coast. Together The Star and 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 \$364 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. Our values – Ownership, True Teamwork, Welcoming and Do The Right Thing – outline what we believe in and how we operate as an organisation. We are also focused on promoting and fostering a culture of responsibility for long-term sustainability and prosperity for our business, our cities, and our people.

For detailed information on The Star Entertainment Group structure please refer to Page 95 in the Annual Report 2021.

## 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**

In FY2021, The Star purchased products and services from approximately 2,010 suppliers over 12 categories with a spend of approximately \$364 million. This is a reduction on the previous year's spend, which is due to reduced capital spend and the impact of COVID-19 on operations.

<b>SUPPLIER CATEGORIES AND FY2021 SPEND*</b>	
<b>\$Million</b>	
72.6	Hospitality (includes food and beverage)
70.5	Property services & maintenance
44.2	Marketing
43.8	IT (hardware, software, services)
38.0	Construction and Equipment
33.7	Gaming equipment and consumables
20.3	Corporate Services
12.3	Professional Services
11.9	Contingent Labour
9.7	Transport
4.7	Travel
2.5	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.

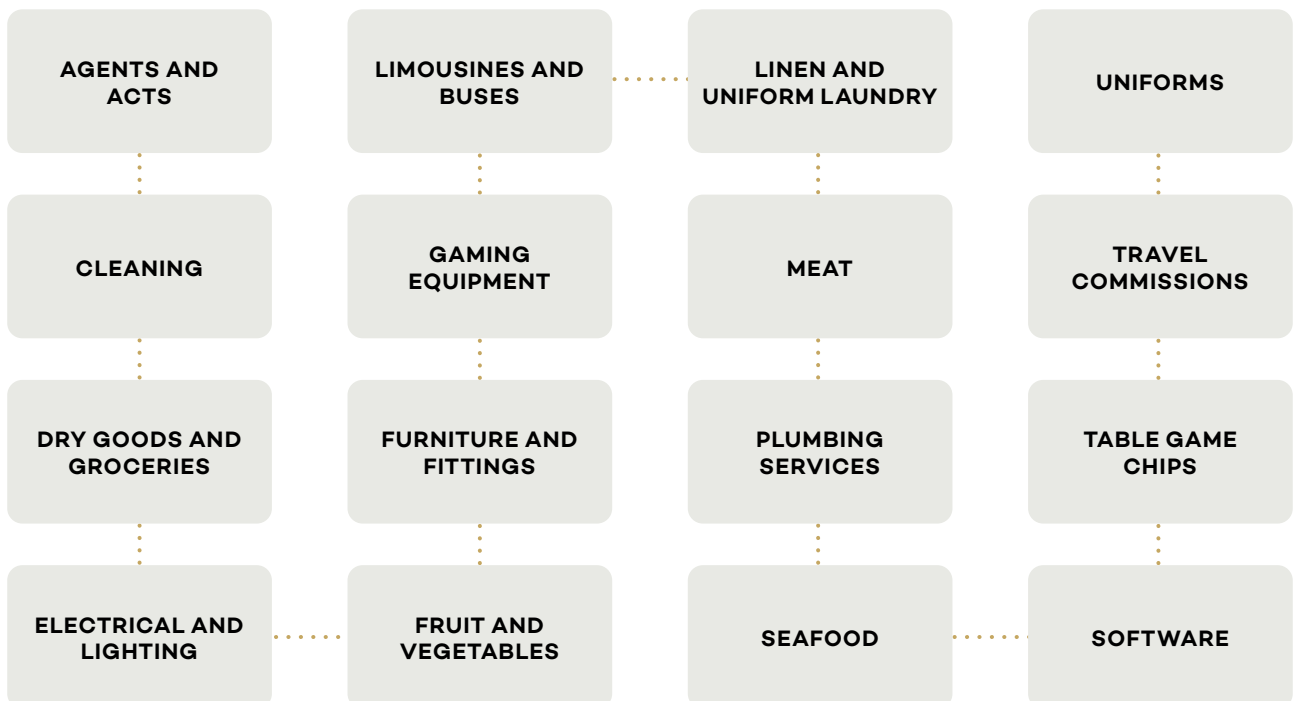
Through consultation with suppliers and other key stakeholders we seek to understand how our activities may cause, contribute, or be directly linked to adverse human rights impacts so that we can work towards ceasing, preventing, and remedying these impacts.

The process of modern slavery risk identification and assessment involves a layered and multi-stakeholder approach. During the reporting period, The Star engaged an external adviser to assist with developing a modern slavery risk analysis framework and implementation activities.

Through a risk-based due diligence process, The Star identified suppliers in the following categories as representing higher inherent risks for modern slavery.

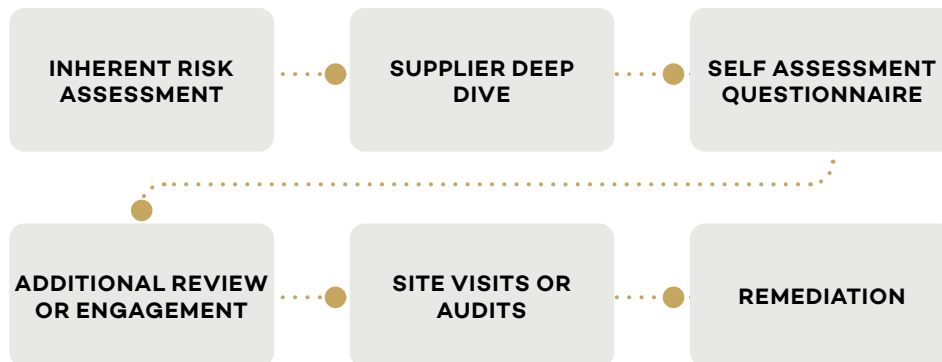
While the data assessment was undertaken on Tier 1 suppliers, consideration is also made to risks deeper in the supply chain for inherent country or industry risks such as:

- **Cleaning:** Potentially vulnerable workers through labour hire companies
- **Seafood:** Risks of slavery deeper in the supply chain, particularly fishing from South East Asia
- **Construction:** Inherent risk due to vulnerable workers through labour hire companies and raw materials and components sourced from high-risk regions.
- **Uniforms:** Inherent risk for apparel manufacturer and raw materials from high-risk regions.



# RISK BASED DUE DILIGENCE PROCESS

During the reporting period, The Star established the following risk-based due diligence process.



## 1. INHERENT RISK ASSESSMENT

An assessment was conducted in the reporting period utilising an external consultant's proprietary assessment tool. The tool integrates results from recognised modern slavery indices and drivers of modern slavery risk including bonded labour, child labour, human trafficking and forced marriage.

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.

The risk assessment was undertaken using The Star's supplier spend data for the period CY2019 as well as Global Industry Classification Standard (GICS) codes. CY2019 data was used as it represented the last unaffected year of full operations since COVID-19, ensuring the suppliers involved with our business during normal trading conditions were included.

The assessment covered 2,158 Tier 1 suppliers, across 25 of The Star's goods and service categories and resulted in a 'dashboard' for The Star to view its modern slavery risk assessment data in an interactive manner.



# KEY INSIGHTS FROM CY2019 SUPPLIER DATA ANALYSIS

## **1. Most of The Star's Tier 1 suppliers operate in inherently low-medium risk countries or industries.**

Of the 2,158 suppliers assessed through the inherent risk assessment, 1,669 suppliers (77%) are considered to have an average inherent modern slavery risk of low or low-medium.

## **2. The Star has a low level of financial exposure to suppliers with a higher inherent risk.**

The majority (82%) of The Star's supply chain expenditure was with suppliers considered to have an average inherent modern slavery risk of low or low-medium.

## **3. The risks of modern slavery may potentially exist deeper within product and service supply chains from the production of raw materials through to the manufacturing of products.**

While The Star has a relatively low level of inherent modern slavery risk exposure in Tier 1 of its supply chains, it may be exposed to higher indirect modern slavery risk related to activities deeper within the supply network

## 2. SUPPLIER DEEP DIVE

Utilising the results of the inherent modern slavery risk assessment, a 'deep dive' was conducted on higher risk Tier 1 suppliers selected based on their level of spend and/or risk rating, as well as other factors such as inherent modern slavery risks deeper within the supply chain.

The deep dives consisted of desktop research that accessed publicly available information and provided details on findings, a conclusion and recommendations as well as risk rating relating to:

- 1. Company management**
- 2. Known labour related contraventions**
- 3. Opaque intermediaries**
- 4. Migrant labour**

## 3. SELF-ASSESSMENT QUESTIONNAIRE

As a result of the inherent risk assessment and supplier deep dives, The Star engaged with 38 suppliers and requested them to undertake a Self-Assessment Questionnaire.

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 helped us gain a better understanding of risks that may be associated with these suppliers.

## 4. ADDITIONAL REVIEW OR SUPPLIER ENGAGEMENT

As a result of the Self-Assessment Questionnaire there were some suppliers that required further clarification or review, through which The Star was able to gain a greater understanding of how modern slavery risks are being managed by these suppliers.

## 5. SITE VISITS OR AUDITS

During the reporting period there were no suppliers that The Star requested a site visit or audit.

However, in the event of a supplier requiring further investigation, an audit and/or site visit would be requested.

## 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.

## ISSUES MONITORING FOR HIGHER RISK SUPPLIERS

The Star utilises Factiva, the business information and research tool to monitor higher risk suppliers for issues related to modern slavery or unethical business management. This continuous monitoring approach allows us to detect issues early and begin the process of engaging with relevant suppliers.

Issues that may be identified through monitoring to flag potential modern slavery concerns are discussed with the Modern Slavery Working Group and Ethics Panel and managed through supplier engagement and remediation process if required.

### CASE STUDY – REVIEW OF THE SEAFOOD SUPPLY CHAIN

In 2020 The Star identified through its regular compliance process that a greater understanding of risks within the seafood supply chain relating to environmental and social impacts was required.

A review conducted by external consultants in 2021 identified possible risks associated with threatened or endangered species, as well as inherent industry and geographical modern slavery risks relating to fishing in regions such as South East Asia.

The review found no direct links to instances of modern slavery in our seafood supply chain. However, we have engaged more deeply with participants in our supply chain and established that a substantial portion of our supply chain is accredited under various assurance schemes. We will continue to work with our suppliers to support them in maintaining and expanding the scope of accreditation and its ubiquity through the seafood supply chain. This will help us support reductions in modern slavery but also improved outcomes in terms of aquatic species loss.



# 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 member.

## 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 questions relating to modern slavery were developed to form part of the formal tender process for major supplier partnerships.

### SUPPLIER CODE OF CONDUCT

This policy establishes requirements of our suppliers across our environmental, social and governance (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 our website and contains details of The Star's independent whistleblowing and integrity service, providing a mechanism for workers to share their concerns regarding working conditions.

### 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:

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

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.

### CASE STUDY – ASSESSING NEW SUPPLIERS

The Star has incorporated questions relating to modern slavery into its formal tender process and has included an assessment of responses into the Group Procurement tender evaluation process.

The first tender that applied this process was for the selection of beverage providers, with responses being reviewed by the Social Responsibility team in early FY2022. This process will be further developed and embedded in FY2022 to ensure modern slavery risks form an active part of the consideration of all new major supplier partnerships.





## 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 ‘E-tips’ whistleblowing hotline**
- **Procurement Policy**
- **Diversity and Inclusion Policy**
- **Health and Safety Policy**
- **Equal Employment Opportunity**
- **Discrimination and Harassment Policy**

Team members undergo mandatory training on key policies such as Code of Conduct 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). The Star has been recognised for LGBTIQ+ inclusiveness in the workplace with a Silver Award in 2021 by the Australian Workplace Equality Index (AWEI).

## MODERN SLAVERY WORKING GROUP

In early 2019, The Star formed a specialist project team drawn from across the group to focus on building our response to the risks of modern slavery in our supply chain. This team has been working diligently since then with support from external advisors to enhance our risk model, risk assessment processes, training and capability, and to plan the future activities required to drive continuous improvement. This team is guided by the Procurement and Governance leaders and sponsored by the Chief Risk and Legal Officer.

### CASE STUDY – DEVELOPING INTERNAL CAPABILITY



Building capability within our teams to understand and manage modern slavery risks is an integral part of our strategy, and the procurement function plays an important role.

Ben joined The Star as part of the Leadership Graduate Program in 2019, which allowed him to gain experience across various areas of the business, including both corporate and operational departments. During the final phase of the program, Ben selected procurement as his specialisation because of the commercial aspect of the role, as well as engagement with internal stakeholders and suppliers. Ben is now a Category Specialist and supports the Modern Slavery Working Group as part of his role. This includes the responsibility of managing supplier engagement, conducting analysis through our risk-scoring mechanism and monitoring adverse media publications.

**“I’m motivated to be part of the solution to address modern slavery and human rights issues. The more you learn about the social concerns within supply chains both domestically and globally, the more you want to contribute to prevent it from occurring.”**

## 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
- The Star's ethical sourcing policy and commitments to ethical supply chain management

## 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, submitting our first Communication on Progress in the reporting period. It is our intention to become active members of the Global Compact Network Australia (GCNA) Modern Slavery Community of Practice in FY2022.

## CUSTOMER AND STAKEHOLDER ENGAGEMENT

During the reporting period The Star received requests from customers and other stakeholders for more information and details of our approach to modern slavery, either as part of their modern slavery due diligence process or building knowledge for their own program development. 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.

## COVID IMPACTS

Due to border closures and operational shutdowns during the reporting period, procurement and supply chain activities were reduced. However, supplier relationships with our valued partners were maintained and we are not aware of any increased modern slavery risks as a result.

# MEASURING EFFECTIVENESS

During the reporting period The Star focused on building capability and key pieces of our modern slavery framework and were able to measure the following outcomes.

## RISK ANALYSIS

We were able to analyse 78% of our CY2019 suppliers, with the remaining suppliers lacking relevant data such as country of origin. This is something we will work to address in our 2022 priorities.

## SUPPLIER ENGAGEMENT

As part of our supplier due diligence, we requested that 38 of our suppliers considered to be higher risk complete a Self-Assessment Questionnaire (SAQ). Of these, 31 suppliers provided a response within the reporting period. The remainder of suppliers were reviewed via alternative methods or are being followed up for a response.

Further to the SAQs being received, there were conversations with some suppliers that deepened our understanding of the management of modern slavery risks within their operations and supply chains, strengthening relationships and building trust.

## EMPLOYEE EDUCATION

We were able to raise awareness of modern slavery throughout the organisation, with over 5500 Team Members completing the modern slavery learning module. Key leaders and team members in Procurement and Supply Chain were required to complete the Modern Slavery course as mandatory (97% completion within the required time). Sixty-nine percent of remaining team members completed the course voluntarily.



# 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) as well as through the Gold Coast Convention and Exhibition Centre which it manages 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.



# OUTCOMES AND FUTURE PLANS

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.

ITEM	ACTIONS	OUTCOMES FY2021	PLANNED FY2022
Training and education	Create and deploy an online Modern Slavery learning program	Complete	Continue
Monitor for evidence of modern slavery risks in higher risk suppliers.	Establish media monitoring for medium-high risk suppliers	Complete – Monitoring through Factiva contributes to risk-assessment process	Continue to monitor and manage
Develop risk assessment framework	Engage consultant to develop a supplier specific risk assessment and due diligence process for modern slavery	Complete – Self-Assessment Questionnaire (SAQ) and risk based due diligence process established	Continue to build on framework and manage due diligence process
Conduct risk assessment on Tier 1 suppliers	Determine inherent risks based on country and industry and other factors – Tier 1 Suppliers	Complete – Risk assessment undertaken through analysis and deep dives	Review and enhance Tier 1 data relating to country of origin and re-supply for risk assessment
Actively engage with higher risk Tier 1 suppliers to understand and manage risks	Gain greater understanding with suppliers through Self-Assessment Questionnaires (SAQ) and other engagement	Complete – SAQs sent to 38 higher risk suppliers. Responses have been used to re-rate these suppliers	Continue supplier engagement program
Embed modern slavery considerations into relevant processes including tendering and the onboarding of new suppliers	Update Supplier Code of Conduct and Request For Proposal documents to include modern slavery information and requirements	Complete – modern slavery clause included in standard form contracts	Continue to embed modern slavery awareness and requirements throughout tendering and onboarding process
Embed modern slavery risk assessment in supplier tender and review process	Include modern slavery related questions as part of standard tender documents	Questions and process established	Embed process through procurement and supply chain, review and manage responses
Deepen understanding of potential risks beyond Tier 1	Work with suppliers to increase awareness of deeper supply chain risks and gain certification where possible	N/A	Engage with cleaning and seafood certification schemes related to modern slavery
Modern slavery program assurance for the Star	Identify and complete internal assurance process	N/A	Undertake assurance process related to the modern slavery program

This statement was approved by the Board of The Star Entertainment Group Limited on 1 December, 2021.

Signed,



**Matt Bekier**  
**Managing Director and Chief Executive Officer**  
**The Star Entertainment Group**



If you would like to contact The Star about modern slavery or this Statement  
please email [ethicalsourcing@star.com.au](mailto:ethicalsourcing@star.com.au) CORP3420