

The Aristocrat logo features the word "ARISTOCRAT" in a white, serif font. A small white circle is positioned above the letter "O". The background is a dark blue-tinted photograph of a warehouse or factory floor with workers in high-visibility vests and industrial equipment.

ARISTOCRAT

The title "Modern Slavery Statement 2023" is displayed in a large, bold, white sans-serif font. A vertical yellow bar is positioned to the left of the text. The background is a dark blue-tinted photograph of a warehouse or factory floor with workers in high-visibility vests and industrial equipment.

Modern Slavery  
Statement 2023

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This is an interactive PDF designed to enhance your experience. The best way to view this Statement is with Adobe Reader. Click on the links in the table of contents or throughout the document to navigate the Statement.

# 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. Aristocrat Global Holdings Pty Ltd (ACN 605 116 783)  
(previously System 7000 Pty Ltd)

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

**(Australian Modern Slavery Act)**

**Reporting Year:** 4

**Reporting Period:** 1 October 2022 – 30 September 2023

**(Financial Year 2023)**

**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 (Company Number 06956635)

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

**(UK Modern Slavery Act)**

**Reporting Year:** 3

**Reporting Period:** 1 October 2022 – 30 September 2023

**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 (Company Number 03207287)

**Legislation:** UK Modern Slavery Act

**Reporting Year:** 7

**Reporting Period:** 1 October 2022 – 30 September 2023

**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 (**A TEL**). For Financial Year 2023, 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.

## **Aristocrat Canadian Reporting Entities**

1. Aristocrat Technologies Canada, Inc (ATCI)
2. Aristocrat Technologies Inc (ATI)

**Legislation:** Fighting Against Forced Labour and Child Labour in Supply Chains Act 2024 (**Canada**) (**Canadian Modern Slavery Act**)

**Reporting Year:** 1

**Reporting Period:** 1 October 2022 – 30 September 2023

**Type of statement:** mandatory statement

This Modern Slavery Statement is submitted in accordance with Part 2 section 11 of the Canadian Modern Slavery Act by Aristocrat Technologies Canada Inc to cover each of the Aristocrat Canadian Reporting Entities specified above and covers all seven mandatory criteria for reporting as set out in Part 2 section 11(3) of the Canadian Modern Slavery Act.



# Foreword from The Chairman and CEO

Aristocrat is opposed to all forms of modern slavery and is committed to addressing the associated risks in our global operations and supply chain. We acknowledge that modern slavery and human trafficking are complex global issues that present risks to all businesses – including our own. We embrace our obligations to identify and address these issues across our global business, and to achieve ongoing improvement.

Our latest statement outlines the progress we have made and highlights the key actions taken in FY23 to improve our Anti-Modern Slavery Program. This is the fourth annual Modern Slavery Statement (**Statement**) published under the Australian Modern Slavery Act and our first Statement published under the new Canadian Modern Slavery Act. Since 2017, we have also reported under the UK Modern Slavery Act, building a formalised, coordinated, and enterprise-wide approach to this crucial issue.

Our core value of ‘Good Business, Good Citizen’ guides our actions at Aristocrat, including our Anti-Modern Slavery Program. The program is designed to identify and address the many forms of modern slavery that exist and support the taking of appropriate action through a robust due diligence process and risk management framework.

We are committed to our Anti-Modern Slavery Program – a program that supports sustainable business operations, conducted ethically and in line with applicable laws, and that recognises that all workers in our operations and supply chains should be treated with respect and dignity.

In past years, our emphasis has been on developing awareness internally and identifying and understanding modern slavery risks through employee engagement across Aristocrat’s operations. As our program has matured, in FY23 we were able to bring additional focus on increasing collaboration and engagement with suppliers. Enhanced due diligence and risk assessment processes with our suppliers is helping Aristocrat identify and mitigate risks in our supply chain and provide valuable insights to guide our future efforts and continuous improvement.

The Statement highlights the progress against the commitments we made in FY22, while also outlining the additional measures implemented in this reporting period. Key accomplishments in this reporting period include:



## Our Employees

- Delivering supplemental role-specific training to both supplier facing employees and employees responsible for hiring practices where higher modern slavery risks may be present.
- Delivered refreshed training for all the Aristocrat Leisure Limited (ALL) Board members.



## Our Business Leaders

- Publishing our Incident Response Guide related to modern slavery incidents and implementing associated processes with relevant business stakeholders.



## Our Supply Chain

- Developing an internal Modern Slavery Risk Management Model. This focused our efforts on better understanding both the risks within our broader supply chain and how to best support our suppliers through an improved Modern Slavery Supplier Survey, including sub-tier suppliers, in addition to on-site compliance checks and supplier audits.



## Our Community

- Holding cross-over Anti-Modern Slavery Champion & Community events to further increase awareness.
- Responding to customer and investor surveys and questions on our approach to anti-modern slavery.

We have also made enhancements to this Statement to better communicate our program of work by:

- Outlining the specific risks in our operations and supply chain, including how we are preparing to mitigate any future risks;
- Sharing more information about the enterprise supply chain, providing an expanded view on previous years' statements; and
- Updating our Key Performance Indicators.

This year we also enhanced our approach to remediation, building upon our previous work to center the remediation process on the risks to victims, not only businesses. We will continue to deepen our focus on our communication and collaboration as we work towards early identification and remediation of potential modern slavery risks across our global business.

We continue to closely monitor modern slavery legislation, in the jurisdictions we report and operate globally, and our future actions and reporting periods will be informed by its outcomes.

In this Statement, we use the term 'anti-modern slavery' where possible, as we recognise the special sensitivity of the term slavery, and the ongoing impact of historical slavery, for some people and communities at Aristocrat. We acknowledge and respect these sensitivities without reservation. In no way do we seek to draw comparisons between people's experiences or to minimise history in this regard.

We acknowledge and thank our dedicated Anti-Modern Slavery Working Group, and all our people who have contributed, for their energy and leadership on these vital issues.

This Statement has been approved by the relevant Boards in accordance with the requirements of the Australian, UK and Canadian Modern Slavery Acts.

**Enhanced due diligence and risk assessment processes with our suppliers is helping Aristocrat identify and mitigate risks in our supply chain and provide valuable insights to guide our future efforts and continuous improvement.**



**Neil Chatfield**  
Chairman



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

# I. Who we are: Our structure and business

## A. OUR STRUCTURE

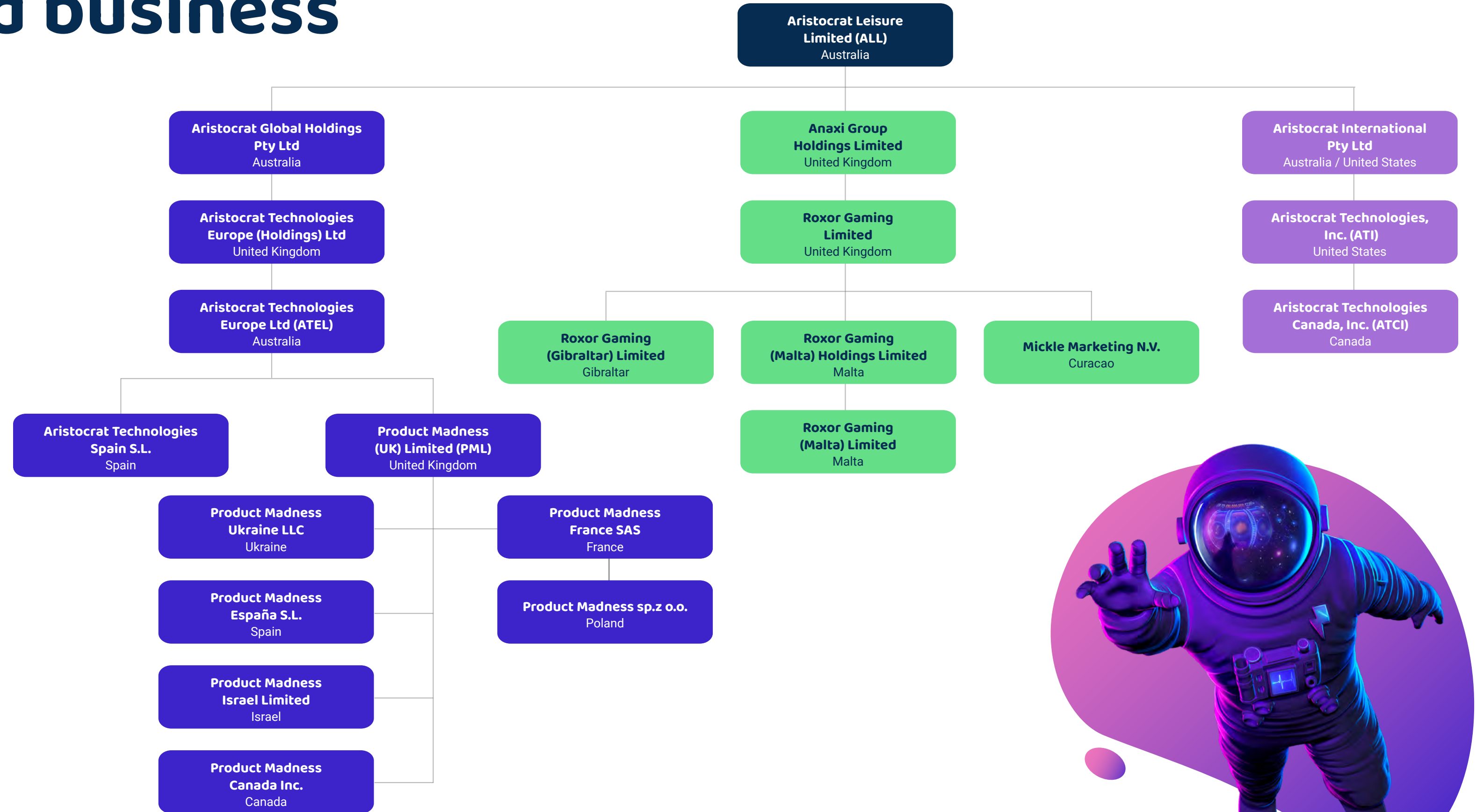
ALL is the parent company for the Aristocrat Group. It is incorporated in New South Wales, Australia and is listed on the ASX (ASX: ALL). Each Aristocrat Australian Reporting Entity (other than ALL):

- is incorporated as a proprietary limited company in Australia; and
- is either a direct or indirect subsidiary of ALL.

Several of Aristocrat’s Australian Reporting Entities own or control a number of subsidiaries or branches which also form part of the Group (see image on right).

In this Modern Slavery Statement, we refer collectively to ALL and its global subsidiaries, including the Aristocrat Australian Reporting Entities, the Aristocrat UK Reporting Entities and the Aristocrat Canadian Reporting Entities 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). All numbers in this report are accurate at the time of writing and may include rounding or approximations.



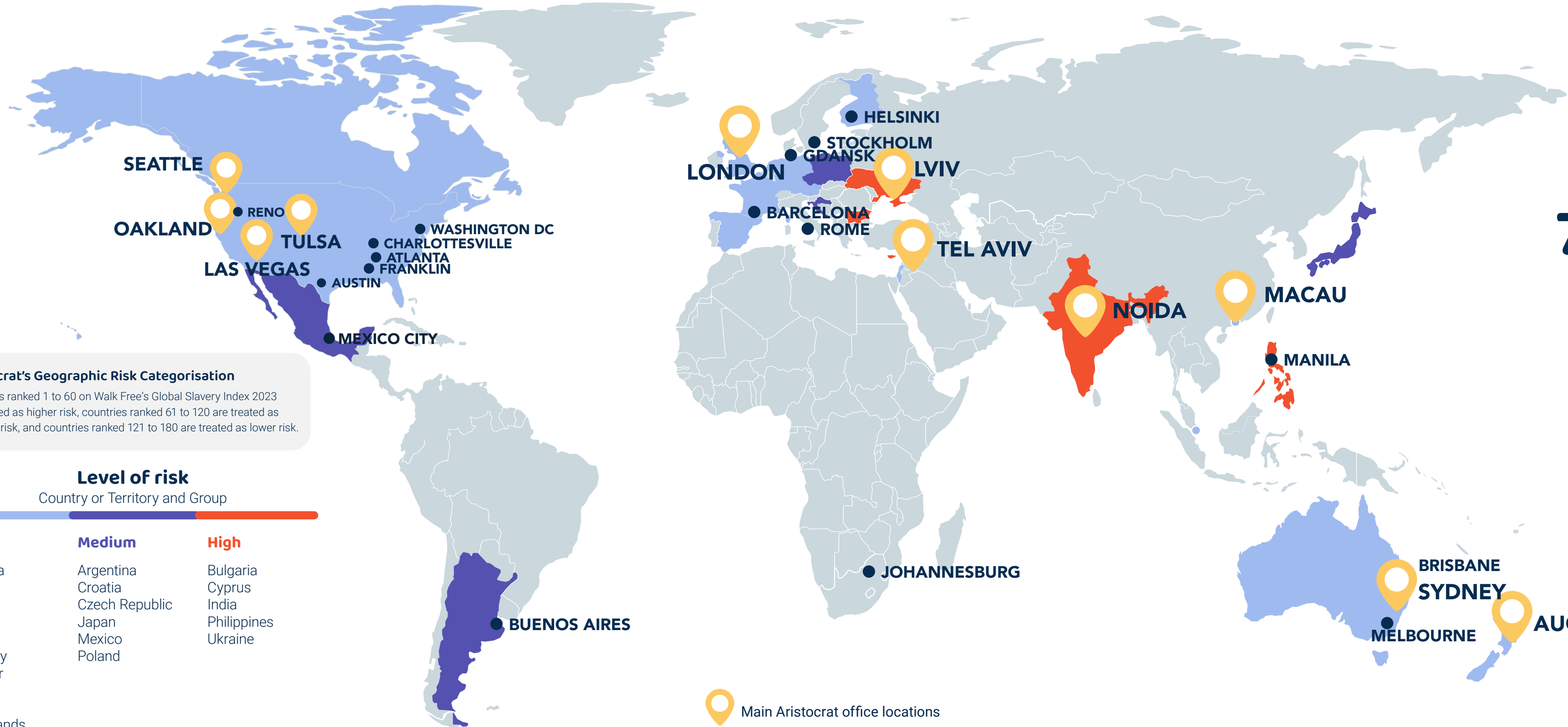
Note 1: This representation of Aristocrat entities is solely to illustrate the relationship of entities mentioned in this statement. It is not a holistic view of all Aristocrat entities. For the above, entities are listed along with their country of incorporation.

Note 2: The Group announced the acquisition of Roxor in September 2022 and the acquisition was completed in January 2023. Since completion of the acquisition, Roxor has been successfully integrated into the Anaxi business as a core product technology, supporting our broader online Real Money Gaming strategy.

Note 3: ATEL is also registered and operating branches in Cyprus and Austria under its own name.

**B. OUR BUSINESS**

The Group has offices and employees located around the world. ALL's registered office is in North Ryde, Sydney, Australia. Globally, the Group offers a diverse range of products and services including electronic gaming machines (EGMs), casino management systems, free-to-play mobile games and online real money games.



**7800+**  
Employees

**20+**  
Locations around the globe

- Main Aristocrat office locations
- Other Aristocrat sites, studios and office locations

\* Note: This also includes British Overseas Territories

**B. OUR BUSINESS**



Aristocrat Gaming is a leading provider of casino games and innovative gaming technology. Operating across three geographic divisions – 1) the Americas, 2) Europe, Middle East and Africa (**EMEA**), and 3) Australia, New Zealand and Asia (**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, and service (**Aristocrat Gaming** or **Gaming**). The systems component of the business (known as Customer Experience Solutions) has now moved under Anaxi. We further strive to lead in the promotion of responsible gameplay as part of a vibrant and sustainable industry.

The Group integrates (assembles) EGMs and gaming systems in Australia, the USA, Macau Special Administrative Region (**SAR**)<sup>1</sup>, the United Kingdom<sup>2</sup> and Spain via local entities in the Group, including ATEL in the United Kingdom, Aristocrat Technologies Spain S.L. in Spain and the Aristocrat Australian Reporting Entities in Australia.

Aristocrat Gaming sells new EGMs and games directly to end customers across the Americas, EMEA and APAC regions. In North America, the business also derives recurring revenue through its gaming operations. Further, Aristocrat Gaming has distribution arrangements in the Americas (including North America and Latin America), EMEA and APAC, through which our EGMs and games are offered via distributors who then market and sell our EGMs and games to customers in each location.



Aristocrat also has a globally operating, mobile-first digital games business, Pixel United, which provides free-to-play social casino, role-play, strategy, casual and social games to customers around the world. Pixel United is comprised of three key business units:

- Product Madness, a top global developer of social casino games, headquartered in the UK;
- Plarium, a mobile and web-based developer of role play, strategy and casual games, headquartered in Israel; and
- Big Fish Games, a global developer of popular casual games across multiple genres, headquartered in the USA.



Anaxi is the Group’s online real money gaming (**RMG**) and customer experience solutions division, which includes the capabilities and talent acquired as part of the acquisition of Roxor in Financial Year 2023. Roxor is a UK-based business-to-business online RMG supplier.

Following the acquisition, we have integrated Roxor’s 120+ employees into the Anaxi iGaming group. These employees are predominantly based in the UK.



During the reporting period we also announced Aristocrat’s proposed acquisition of NeoGames, a global leader in content and technology solutions for the online RMG industry. The acquisition is expected to be completed during the calendar year 2024, subject to the satisfaction of various conditions.

1. The integration centre in Macau SAR closed on 30 September 2023 and the Group no longer assembles EGMs and gaming systems in Macau SAR.  
 2. The integration centre in the UK closed on or around 30 May 2023 and the Group no longer assembles EGMs and gaming systems in the UK.



### 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 approach and response to modern slavery.

Subject to any limited exceptions noted in this Statement, all entities in the Group are required to comply with our anti-modern slavery 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 chains

### A. OUR OPERATIONS

#### Aristocrat Gaming Australia

ALL, Aristocrat International Pty Ltd and Aristocrat Global Holdings Pty Ltd<sup>3</sup>, 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 (**ATA**) is the only operational entity.

**ATA's principal activities include the integration (assembly), marketing and sale of EGMs and ancillary equipment and services, predominantly in Australia.** This includes at our integration facility located in Sydney, Australia for integration (assembly) and final configuration of EGMs. 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.

Some Aristocrat Australian Reporting Entities also own, or control Group entities based in other locations which employ workers. Nearly all permanent and contingent workers of ATA were based in Australia.

ATA had approximately **1000 workers**.

About **90 per cent were full-time or part-time permanent employees**, and the remainder were contingent workers, including temporary, agency or contracted workers.

The other Aristocrat Australian Reporting Entities did not employ any workers.

3. Effective 8 September 2023, System 7000 Pty Ltd was renamed Aristocrat Global Holdings Pty Ltd to better reflect the global nature of this holding entity.

#### Aristocrat Gaming EMEA

Aristocrat Technologies Europe Limited (ATEL) is one of Aristocrat's UK Reporting Entities and, along with Aristocrat Technologies Spain SL (**ATSS**), both are operational entities for the Aristocrat Gaming business across the EMEA region.

**ATEL's principal activities are the integration (assembly), marketing and sale of EGMs and related equipment and services in the EMEA region.**

ATEL does business in, or has a permanent and contingent workforce residing in, Bulgaria, Croatia, Cyprus, Czech Republic, France, Germany, Netherlands, South Africa, Spain and the UK. Its operations do not include Pixel United or Anaxi.

ATEL and its subsidiary, ATSS, had approximately **80 workers**.

Almost **96 per cent of these workers were full-time or part-time permanent employees**; the remaining workers were contingent workers, including temporary, agency or contracted workers.

In the same period, almost **86 per cent of the permanent and contingent workers of ATEL and its subsidiary were based in the UK and Spain.**

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

## A. OUR OPERATIONS

### Aristocrat Gaming - Canada

Aristocrat Technologies Canada, Inc (ATCI) and Aristocrat Technologies, Inc (ATI) comprise Aristocrat's Canadian Reporting Entities, which carry out operations for the Aristocrat Gaming business unit in Canada.

**ATCI's principal activities in Canada include the marketing, lease and sale of EGMs and games, and provision of related equipment and services.**

ATCI has a permanent and contingent workforce predominantly based in Canada.

ATCI has approximately **35 workers based in Canada.**

### Pixel United

Product Madness (UK) Limited is one of Aristocrat's UK Reporting Entities and along with its direct and indirect subsidiaries, carries out operations for the Pixel United business unit.

**PML's principal activities are to provide development, operational and support services in respect of free to play, social and casual games which are published by a related entity, Product Madness, Inc., which is a company incorporated in the USA.**

PML's activities are supported by its subsidiaries located in Ukraine, France, Poland, Spain, Israel and Canada.

PML has a permanent and contingent workforce residing in countries which include Canada, UK, and USA<sup>4</sup>.

PML and its subsidiaries had approximately **830 workers.**

Approximately **90 per cent of the workers were full-time or part-time permanent employees**; the remaining workers were contingent workers, including temporary, agency or contracted workers. In the same period, almost 40 per cent of the permanent and contingent workers of PML and its subsidiaries were based in the UK.

4. PML may have a limited number (fewer than 10 in each of the following countries) of permanent and contingent workforce residing in countries which include Brazil, Czech Republic, Netherlands, Germany, Israel, Latvia, Pakistan, Hungary, Mexico, Türkiye and Portugal.

## B. CHARITABLE DONATIONS

Aristocrat has a proud history of giving back to the communities in which we live and work. Our giving program, AristocratCARES, is guided by our core values and supported by committed and passionate employees and strategic corporate giving initiatives. With an impact on both a local and global scale, the program supports employee volunteering and fundraising events and awards and grants to impactful non-profit organisations. The Group will continue to assess current and future charitable opportunities that relate to potential modern slavery victims. For more information and details of our community contribution in the Financial Year 2023, please visit [www.aristocrat.com/sustainability](http://www.aristocrat.com/sustainability).

### 1. St. Jude's Ranch for Children

St Jude's Ranch for Children is committed to serving children who are victims of human trafficking within their community. In 2023 Aristocrat worked with and supported St. Jude's Ranch for Children as part of our focus on community and corporate social responsibility (CSR).



**Aristocrat donated funds** to the organisation to build The Healing Center, specifically focused on the Technology Lab. The Technology Lab will serve as the technology center for the children and their families at The Healing Center.



Dr. Vela, St. Jude's Ranch for Children's CEO, **spoke to our Anti Modern Risk Champions in a cross over event** to raise awareness about modern slavery risks, the impact our business can have, and how to support our community.

“As part of the engagement with Aristocrat's Anti-Modern Slavery Champions, I was invited to speak with the Las Vegas team in March 2023. I was pleased to learn more about Aristocrat's commitment to preventing and responding to modern slavery risk and impressed with their strategy for managing this risk within their business. The entire team was very interested to learn more about both the individual and community impacts of modern slavery and how collectively we can all contribute to preventing and identifying risks of modern slavery and then helping those who have been affected. We are truly grateful for the partnership with the Aristocrat team and their commitment to our community and those most in need!”

Dr. Vela, CEO St Jude's Ranch for Children



Aristocrat facilitated an **employee volunteer service day** at St. Jude's Ranch for Children with 65 volunteers, totaling 293 hours of service.



**2. Unshakeable**

Unshakeable is a grass roots, non-profit organisation serving women in recovery from homelessness, domestic violence, substance addiction and human trafficking. Aristocrat donated funds to Unshakeable’s educational and recovery courses.



**C. OUR SUPPLY CHAINS**

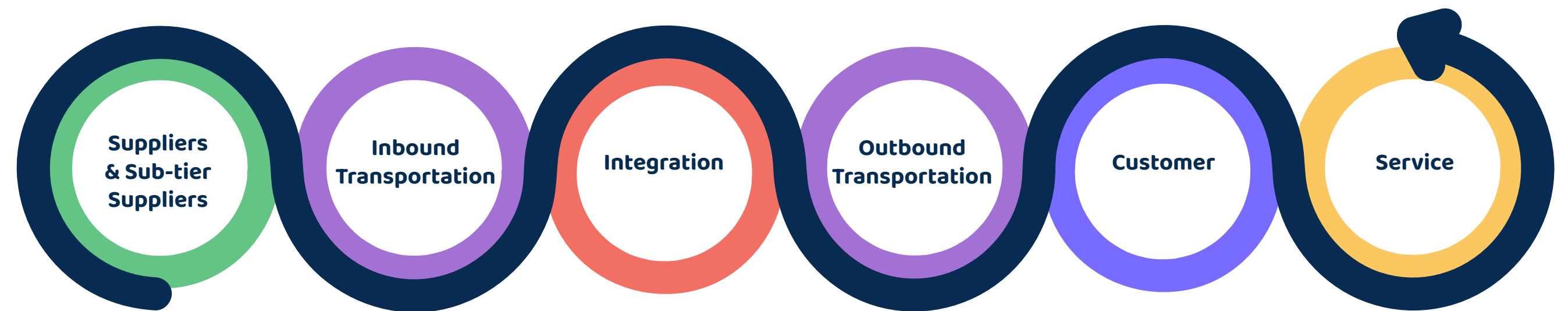
Aristocrat’s supply chain is large, global and complex. Given the diverse nature of our businesses, the Group has several supply chains that support the delivery of value to our customers. The supply chains have differing levels of modern slavery risk (as discussed in [Potential Risks in our Supply Chain](#)).

**1. Hardware Supply Chain**

The Hardware supply chain supports both the Gaming business and parts of the Anaxi business. The risks linked to the electronics industry are covered in [Potential Risks in our Supply Chain](#).

In this reporting period, approximately **96 percent** of our spend for the Hardware supply chain was attributed to **39 key direct suppliers** and **14 managed sub-tier suppliers** (**Key Direct Suppliers** and **Sub-Tier Suppliers**). The 14 identified sub-tier 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. The graphic shows the Hardware Supply Chain.

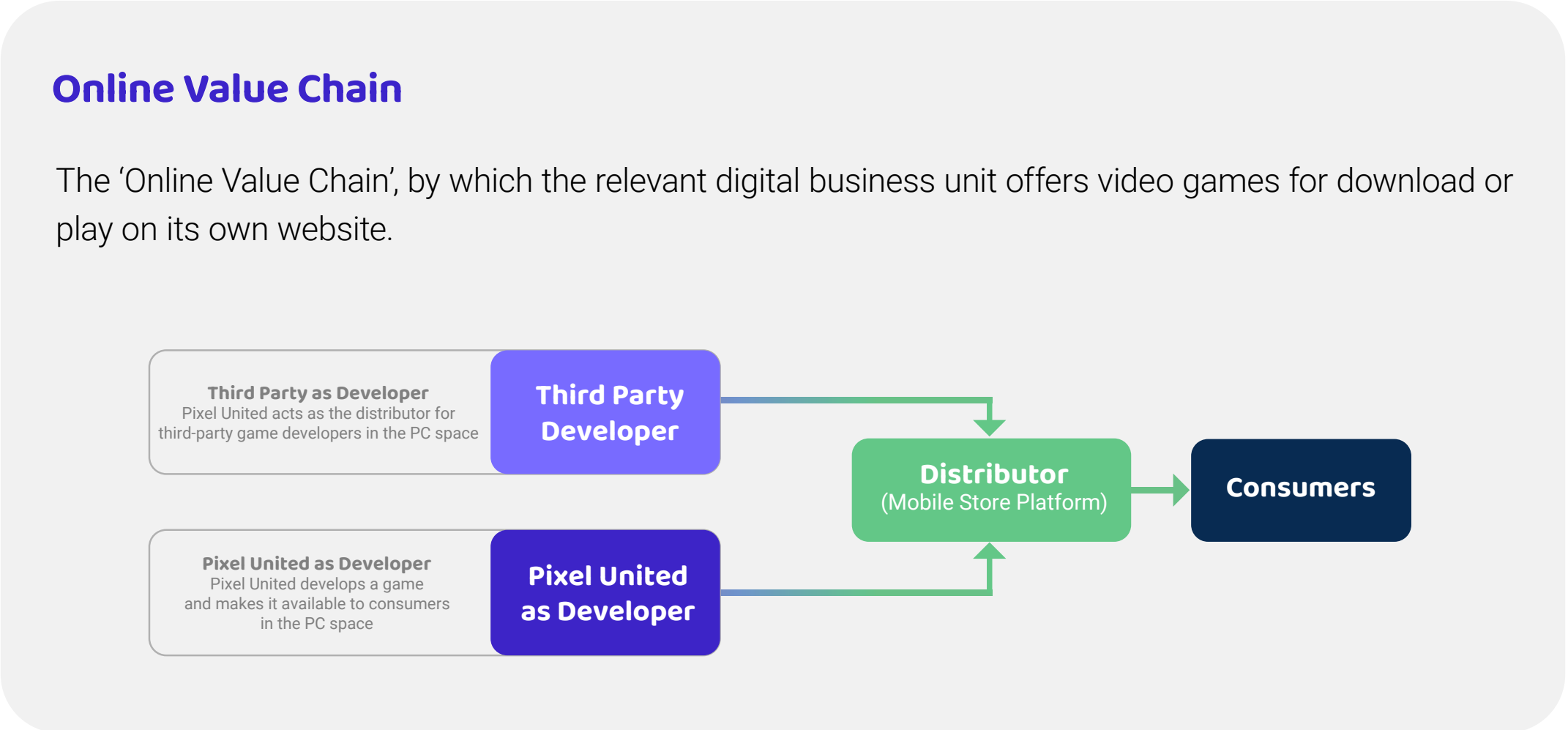
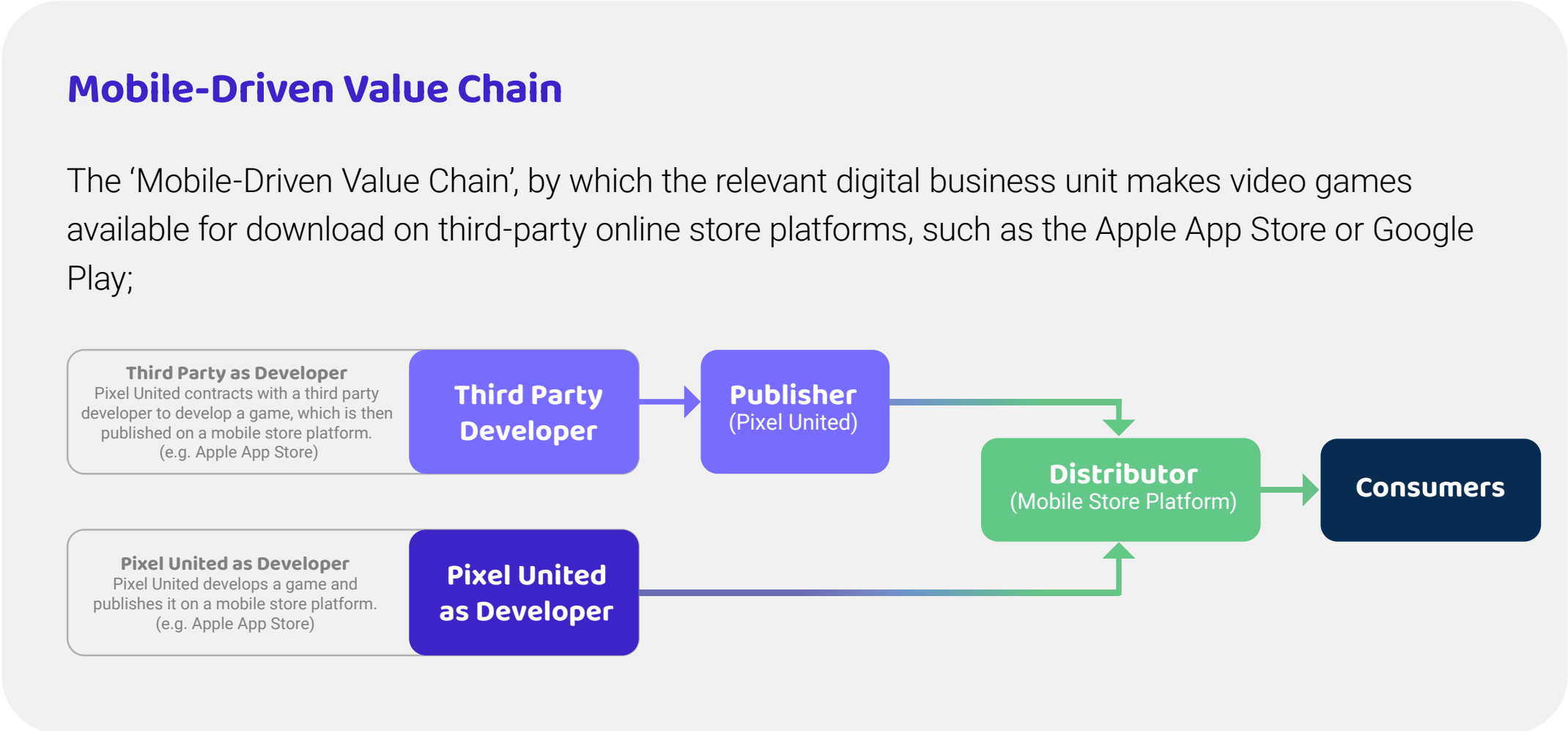
**Hardware Supply Chain**



**C. OUR SUPPLY CHAINS**

**2. Digital Supply Chain**

In this reporting period, approximately **13 percent** of our spend for the Digital supply chain was attributed to approximately **60 direct suppliers**. The digital businesses, which include Pixel United and parts of the Anaxi business, have two types of supply chains as shown in the diagrams (below). The risks in the Digital supply chain are predominately linked to working conditions tied to service delivery as discussed in [Potential Risks in our Supply Chain](#).



Note: In each instance, the games may be developed by a third-party developer (contracted by digital) or by the individual digital business unit itself.

C. OUR SUPPLY CHAINS

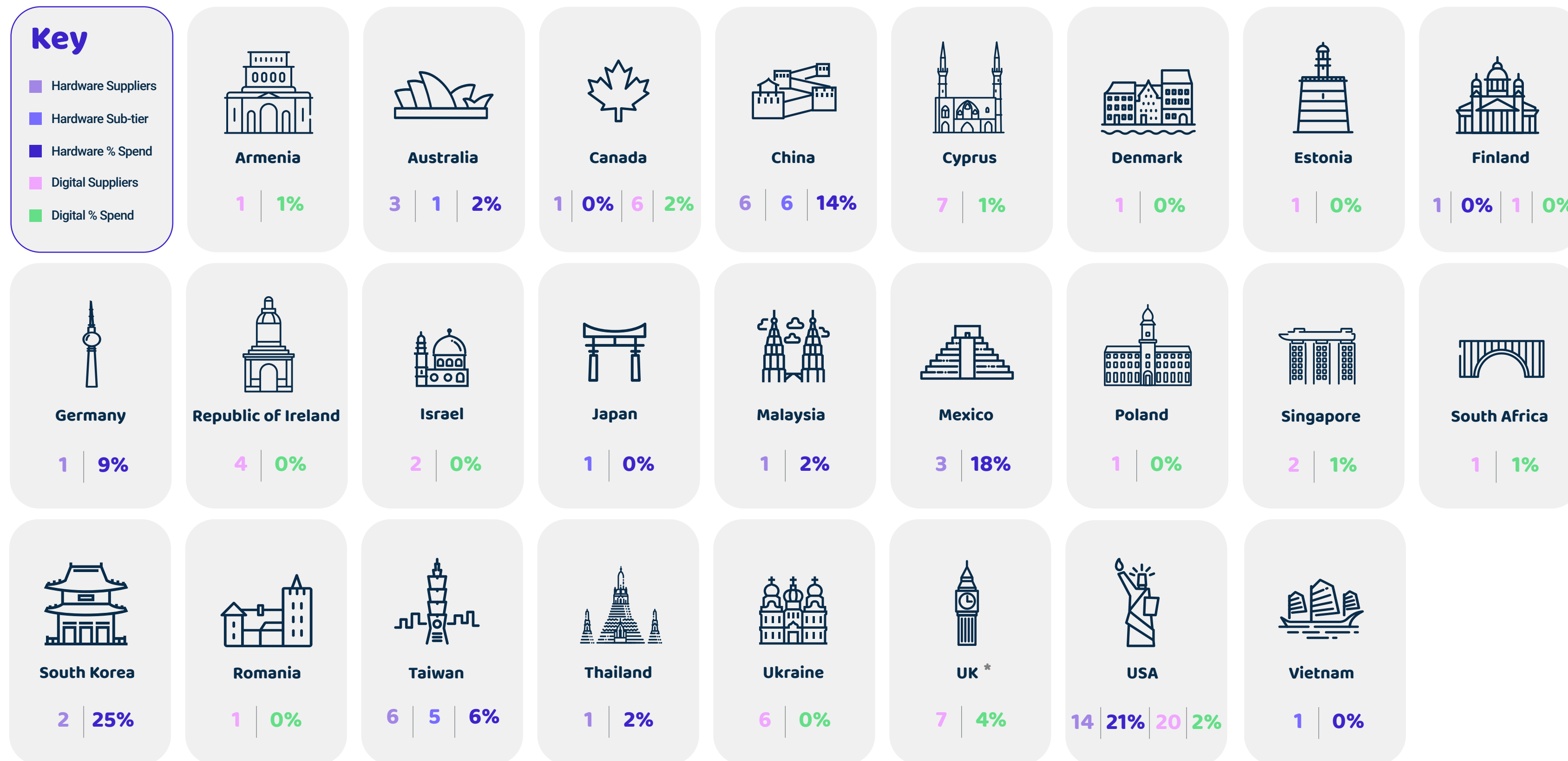
3. Location of suppliers

Our Supply Chain is large with approximately **100 key direct suppliers and sub-tier suppliers across 25 countries**. In this statement, we have aggregated the data from our hardware and digital supply chains across the Group to show an improved view of our full direct supply chain by country.

Note: Suppliers were categorised as sub-tier suppliers if they have supplied the majority of their products to Aristocrat's direct suppliers but not to Aristocrat directly. In some cases, the identified sub-tier suppliers may also have provided 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 were supplied to Aristocrat's direct suppliers and all relevant spend was captured at the direct supplier level.

The  shows actions that have been newly implemented in Financial Year 2023

Key Direct Suppliers and Sub-Tier Suppliers (Hardware and Digital) 



\* Note: this also includes British Overseas Territories

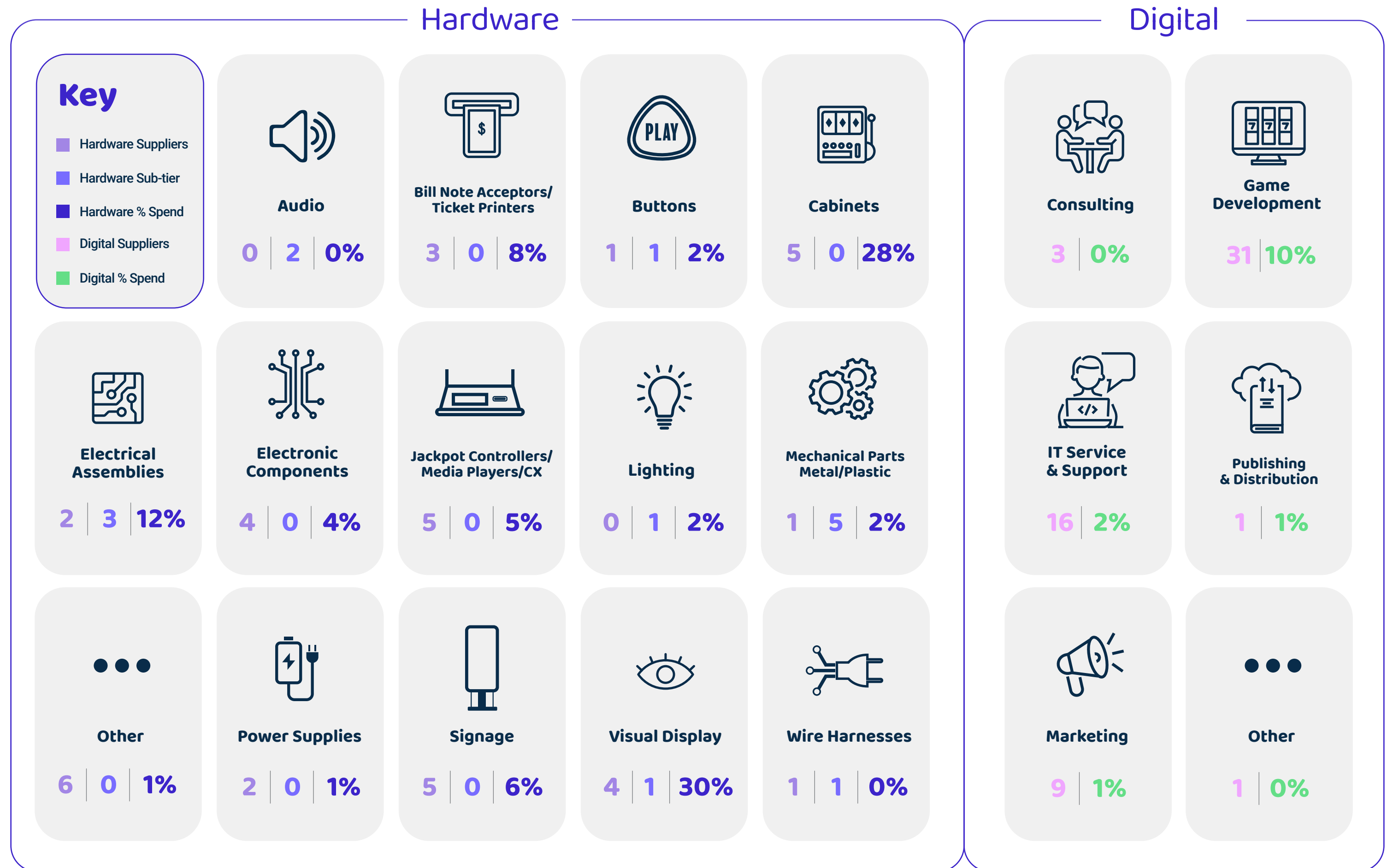
C. OUR SUPPLY CHAINS

4. Product and Service Categories 

In this statement, we have provided additional details around the product and service categories in our digital supply chains in addition to the information previously provided regarding our hardware supply chain (formally referred to as “Critical Products (Gaming)”).

Note: Suppliers were categorised as sub-tier suppliers if they have supplied the majority of their products to Aristocrat’s direct suppliers but not to Aristocrat directly. In some cases, the identified sub-tier suppliers may also have provided 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 were supplied to Aristocrat’s direct suppliers and all relevant spend was captured at the direct supplier level.

Key Direct Suppliers and Sub-Tier Suppliers



\* Note: this also includes British Overseas Territories



### 5. Indirect Sourcing

To support Aristocrat Gaming, Pixel United and Anaxi, the Group engages a range of other suppliers who supply goods or services that are not integrated or used in our gaming products nor in relation to mobile game development. These are suppliers from whom we purchase goods or services to support our day-to-day operations, for example, travel, technology, utilities, facility management, learning and development, marketing, professional services and more (**Indirect Goods and Services**).

## C. OUR SUPPLY CHAINS

### 6. Understanding our Supply Chain

Beyond our supply chain’s large global footprint, there are additional complexities we consider.

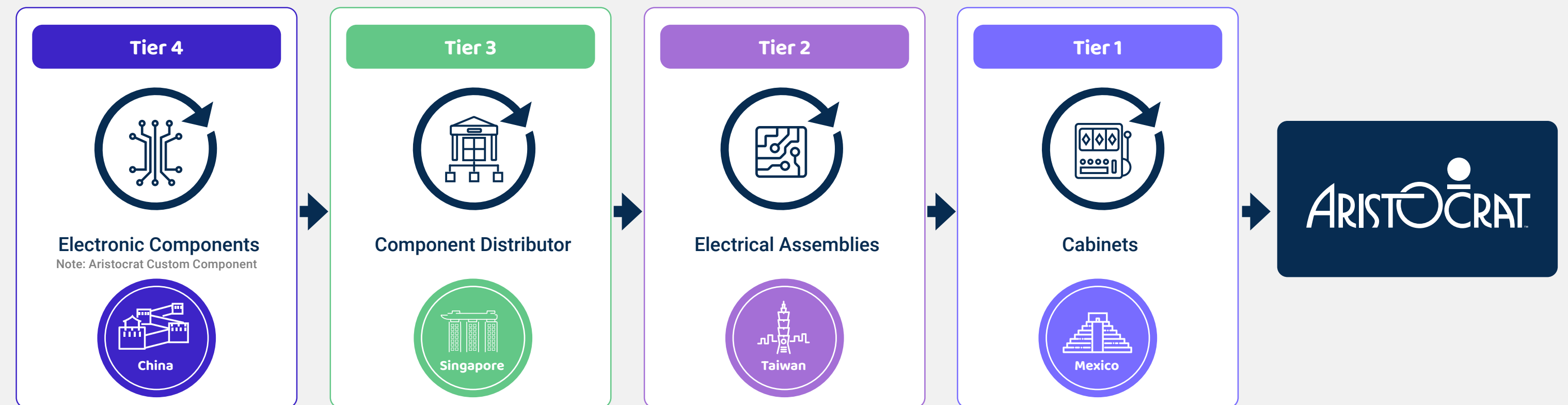
#### a. Multi-tiered Supply Chain

Aristocrat acknowledges that our responsibility within our supply chain is not limited to our contracted suppliers. Since the last reporting period, the Resiliency team has been involved in a test and learn scenario to gain greater insight into our suppliers’ supply chain through multiple levels, including visibility down to tier 3 suppliers and beyond (see image to the right).

## Modern Slavery & Resiliency Teams Cross Over Case Study

In 2023, the team commenced implementation of a software solution to map our sub-tier supply chain to better understand the holistic risk environment. We are engaging with our key Hardware suppliers to collect part category and geographic locations of their suppliers (Aristocrat’s tier 2 suppliers). We will continue to map this information

to tiers 3 suppliers and beyond. For example, the graphic (below) portrays the mapping of product risk and geographic risk through multiple tiers of our supply chain. This also demonstrates the customised nature of Aristocrat’s products, which is further discussed in [Potential Risks in our Supply Chain](#).



**C. OUR SUPPLY CHAINS**

**b. Gaming Regulations and Technical Requirements**

To comply with gaming regulations and Aristocrat's technical requirements, the number of suitable suppliers may be limited. Many of Aristocrat's proprietary designs require the sourcing of custom manufactured parts that cannot be purchased "off the shelf." For example, within the hardware portfolio there are thousands of complex custom parts that require a close, long-term relationship with our suppliers.

**c. Level of Influence with Suppliers**

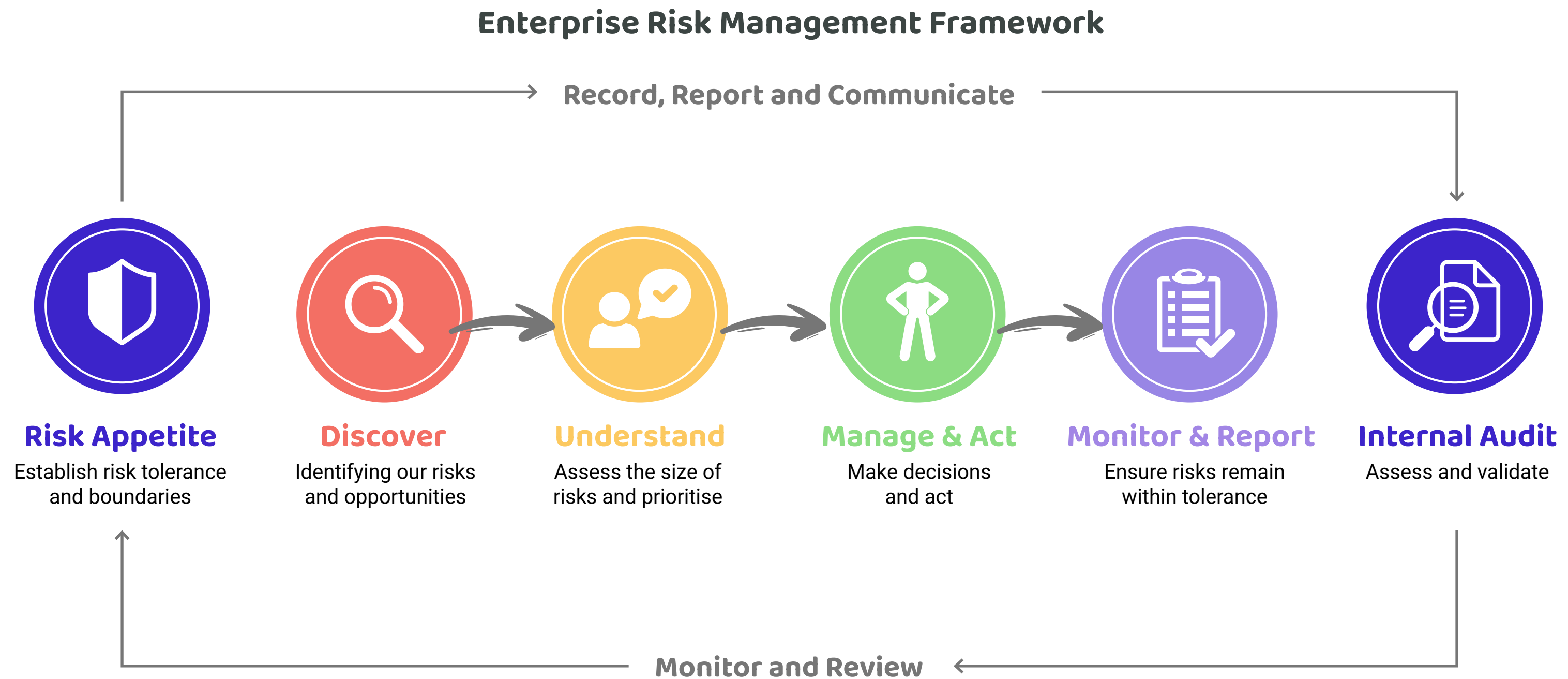
Aristocrat has more influence regarding modern slavery awareness, identification, and risk mitigations with our Hardware suppliers and sub-tier suppliers than our Indirect or Digital suppliers. This level of influence can be attributed to many factors, including our long-term relationships, contractual agreements, and the level of spend with these suppliers.

Across our supply chain we engage with suppliers ranging from small local business to large multinational corporations. Many of the larger companies may have modern slavery risk structures already in place. Where possible, Aristocrat aims to support any of our suppliers to uplift their anti-modern slavery programs covering awareness, risk identification and mitigations. For example, upon request by Hardware suppliers, the Working Group shared Aristocrat developed tools to assist those suppliers to uplift their internal modern slavery risk management capabilities.



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

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



The Group examines three key indicators to identifying modern slavery risks in our operations and supply chain:



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

We consider the risk that some industries, sectors and products may be more susceptible to modern slavery, taking into account the composition of the workforce. For example, we recognise that risks may be greater in industries, sectors and products 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.



**Geographic risk indicators:**

We consider the risk that some countries in which we operate are reported to have a higher prevalence of modern slavery compared to other countries. We continue to base these assessments on the Walk Free Global Slavery Index, which was updated in the Global Slavery Index 2023<sup>5</sup> and have assigned risk ratings to our countries of operation based on that index.



**Working condition indicators:**

Finally, we consider that the following may be indicators that working conditions are poor:

1. Restriction of movement (including freedom to leave their job)
2. Withholding of wages and/or benefits
3. Excessive overtime
4. Retention of identity documents
5. Unsafe work environment



5. Walk Free’s Global Slavery Index can be found at <https://www.walkfree.org/global-slavery-index/map/>.

The likelihood and impact of any identified potential risks are assessed using the Group’s enterprise risk rating tables to determine the significance of each risk. We consider existing actions and controls to determine if and where further mitigations are required to reduce the risk to its target risk rating. We describe additional aspects of our approach to addressing potential modern slavery risks in [Section IV](#) below.

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.

### Summary of our modern slavery risks

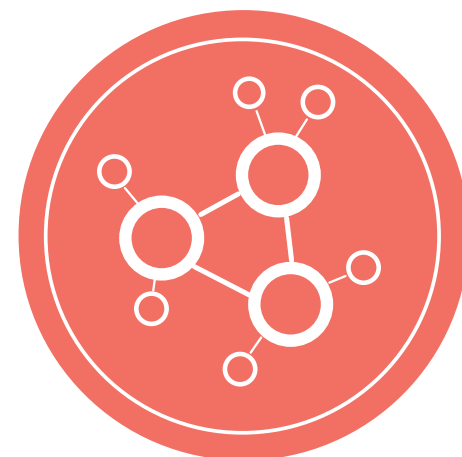
As reported in previous years, we have identified the following potential modern slavery risks, which we have broken down into:



Risks where Aristocrat could potentially **cause** modern slavery as a direct result of our actions.



Risks where Aristocrat could be **directly linked** to modern slavery practices.



Risks where Aristocrat could potentially **contribute** to modern slavery, indirectly through our activities.

Given the above types of risk, we have identified the following potential risks within our operations and supply chain. We recognise that changing external factors, such as geopolitical tensions and climate change may present increased risks in our operations and supply chain. Given that risk is not static, we will continue to regularly review our business and its external factors to consider the potential change to the risks identified as well as whether new risks should be added.

#### In our operations...

**Through our own employment practices,** the Group could potentially **cause** modern slavery.

**Through our engagement of contractors and temporary workers,** the Group could potentially be **directly linked** to modern slavery, as the compliance practices of recruitment agencies and other third parties may not be fully visible to Aristocrat.





**Through our charitable donations,** Aristocrat could potentially **contribute** to modern slavery if goods that we donate have been manufactured by or sourced from suppliers that engage in modern slavery practices.

**Through our corporate activities** Aristocrat could potentially **contribute** to or be **directly linked** to modern slavery if we acquire or invest in companies that themselves have significant modern slavery risks or engage in modern slavery practices.

#### In our supply chains...








**Through our purchases of products and services,** the Group could potentially **contribute** to or be **directly linked** to modern slavery if any of the goods or services we procure, or their components, were produced, transported, or provided using modern slavery.

## A. POTENTIAL RISKS IN OUR OPERATIONS









Risk	Current Risk Status & Mitigations	Projected Risk Change over Next Year	Projected Risk Change Rationale	Future Mitigations Under Consideration
 <p><b>Working Condition</b></p> <p>Employment practices for direct/permanent workers are not compliant with laws in the applicable jurisdictions.</p>  <p>Cause</p>	<p>Although we acknowledge that Aristocrat, as with all employers, could in theory cause this modern slavery risk, we consider the likelihood of this risk is mitigated due to the following measures in place:</p> <ul style="list-style-type: none"> <li>Employee pay and benefits are governed by the Aristocrat Global Reward policy that specifies median market pay for local and regional locations.</li> <li>Within Australia and New Zealand, 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. The certification process for these Agreements ensures employees are better off overall when compared to the relevant modern award.</li> <li>For all other regions, we review our employment agreements and practices in consultation with our external lawyers, as necessary, to ensure we are compliant with all laws in the applicable jurisdictions.</li> <li>For employees under individual contracts, we undertake regular reviews to benchmark pay benefits and employment conditions to ensure that employment terms are equal to or above the legislative minimums.</li> </ul>	→	<p>Aristocrat has taken significant steps to ensure the safety, security and wellbeing of its employees impacted by the <a href="#">Ukraine conflict</a>.</p> <p>As a global company, we acknowledge we operate in countries where geopolitical tension exists, as illustrated on the <a href="#">map</a>. We are also prepared to navigate complex geopolitical situations as they arise throughout the world, including maintaining the health and safety of our people globally.</p>	<p>This risk and its mitigations will continue to be reviewed as part of the standard People &amp; Culture processes.</p>
 <p><b>Working Condition</b></p> <p>Employment practices for contractors/ temporary workers are not compliant with laws in the applicable jurisdictions.</p>  <p>Directly Linked</p>	<p>There are times when we engage temporary workers directly or through an employer of record arrangement<sup>6</sup>. Where possible, we engage temporary workers and contractors directly (e.g., we will endeavour to set up an entity where there are 5 or more workers in one location).</p> <p>When directly engaging temporary workers and contractors, we have written agreements with these workers governing their engagement with Aristocrat, including:</p> <ul style="list-style-type: none"> <li>Key terms provided in writing in a language they will understand,</li> <li>The freedom to terminate their employment at any time,</li> <li>Appropriate notice termination provisions in favour of the contractor/temporary worker, and</li> <li>The freedom to refuse overtime work and leave the premises at the end of their shift.</li> </ul> <p>These workers will receive the same pay and benefits terms as any relevant Aristocrat Enterprise Agreement or in accordance with at least the minimum defined pay rates for their classification. Where possible, our practice is to permanently convert these workers to permanent employees on the same terms as current employees.</p> <p>Where we do engage temporary workers and contractors indirectly through an employer of record, we have a service agreement in place which regulates their employment.</p> <p>For Aristocrat Gaming, we have updated all key staffing agreement templates for contingent workers globally to include specific clauses addressing modern slavery risks.</p> <p>We have also developed a standalone risk questionnaire for our People &amp; Culture teams globally to obtain further information on contingent worker engagements so that we can identify any additional modern slavery risks and assess what additional risk mitigation measures (if any) may be required.</p>	→	<p>There is no current projected change to the practice or frequency of using contractors/ temporary workers.</p>	<p>There is a cross functional (including People &amp; Culture, Legal, and the Business) project to review contingent workers in the context of Aristocrat's location strategy. This includes considering modern slavery risk and how to mitigate this risk.</p>

6. An employer of record hires employees on behalf of Aristocrat. They are required to ensure and maintain all and any of the local employment terms and condition requirements to meet the minimum legislative requirements for employment. This is different from a recruitment agency who do not have those same requirements or as part of their service offering.

**A. POTENTIAL RISKS IN OUR OPERATIONS**







Risk	Current Risk Status & Mitigations	Projected Risk Change over Next Year	Projected Risk Change Rationale	Future Mitigations Under Consideration
 <p><b>Industry, Sector, Product</b></p> <p>Companies we have recently acquired or have invested in have significant modern slavery risks or engage in modern slavery practices.</p>  <p>Directly Linked</p>	<p>The Mergers &amp; Acquisitions (M&amp;A) due diligence process has embedded modern slavery due diligence requirements. This helps the business understand the specific risk factors associated with entering new business ventures and geographies before a target company is acquired. This enables us to identify modern slavery risks and incidents in the target operation and supply chain, and any systems and processes already in place to identify and address modern slavery risks in the target operation and supply chain and undertake appropriate due diligence of employees and contingent workers.</p>	<p>N/A</p>	<p>Any further disclosure about the Group's future strategies regarding potential M&amp;A activity would be likely to result in unreasonable prejudice to the Group.</p>	<p>This risk and its mitigating actions will continue to be reviewed through post-acquisition reviews of the effectiveness of the integration playbook, and appropriate updates will be made as required.</p>
 <p><b>Geographic</b></p> <p>Modern slavery practices are found within our operations.</p>  <p>Cause</p>	<p>The majority, 63%, of the <a href="#">Group's employees are in locations</a> that have been identified in the Global Slavery Index 2023 as having a lower prevalence of modern slavery.</p> <p>A small percentage, 8%, of our employees are in locations with a medium prevalence of modern slavery.</p> <p>There are approximately 29% of our employees in locations with a high prevalence of modern slavery.</p> <p>We note that the geographic risk is not specific to Aristocrat and would be applicable to any business operating in these locations. However, we take these risks seriously and have implemented the below mitigations and those mentioned in <a href="#">Section IV</a> to address these risks.</p> <p>In addition to the risk mitigations mentioned above related to our employment practices, 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.</p> <p>Additionally, many global policies, including our Anti-Modern Slavery Policies are available in the languages reflective of our global footprint.</p>	<p>↑</p>	<p>There is the possibility given recently proposed acquisitions that employees may be located in countries with a higher prevalence of modern slavery increasing this risk.</p>	<p>The Group will continue to review the risk prevalence of the geographies in which we operate or any new geographies. As part of our M&amp;A integration plans, we will work to incorporate newly acquired companies and their employees into the standard Aristocrat policies and processes.</p>
 <p><b>Industry, Sector, Product</b></p> <p>Goods that we donate or are used for promotional products have been manufactured by or sourced from suppliers that engage in modern slavery practices.</p>  <p>Contribute</p>  <p>Directly Linked</p>	<p>Although not formally part of our business supply chain, we still acknowledge the risk associated with donated or promotional goods.</p> <p>Aristocrat has determined that the modern slavery risk may be heightened, when:</p> <ul style="list-style-type: none"> <li>the relevant goods, or components of the goods, are on lists such as the U.S. Department of Labor List of Goods Produced by Child or Forced Labor – such as toiletries containing palm oil; and</li> <li>there are allegations of poor or unlawful employment practices by the supplier;</li> <li>promotional products and branded merchandise are associated with low cost and high-volume manufacturing; and</li> <li>products possibly contain materials that are known to be higher risk (e.g., cotton from the Xinjiang region of China).</li> </ul>	<p>→</p>	<p>The types of goods that would be donated or used for promotional purposes are not expected to change significantly in the next year.</p>	<p>In the next financial year, we will consider creating a Global Policy for Donations and providing the Marketing and CSR Teams with role specific training and awareness.</p>

**B. POTENTIAL RISKS IN OUR SUPPLY CHAINS**

Risk	Current Risk Status & Mitigations	Projected Risk Change over Next Year	Projected Risk Change Rationale	Future Mitigations Under Consideration
 <p><b>Industry, Sector,</b></p> <p><b>Business Area:</b> Supply Chain - Direct</p> <p><b>Forced labour and/or child labour is used in our suppliers' operations.</b></p>   <p>Contribute      Directly Linked</p>	<p>Suppliers of electronic components are potentially higher risk, due to reported forced labour and child labour in consumer electronics factories (i.e., laptops, computers and mobile phones), particularly in some Asian countries.</p> <p>However, the electronic components sourced by Aristocrat are not "consumer electronics." Aristocrat's electronic products are different, being low volume, industry-specific, non-consumer products. Aristocrat continues to monitor this sector given the relatively high-risk level associated with "consumer electronic components" generally.</p> <p>Aristocrat's likelihood of this risk is further lowered as assemblies are bespoke, lower volume of electronic assemblies in our industry, meaning they require higher skilled employment. The vast majority of electronic assemblies supplied to Aristocrat are custom-made to Aristocrat's specifications and as such we work extremely closely with our suppliers to influence their supply where practical.</p>		<p>The majority of the electronic component purchases are within the Hardware supply chain. The level of risk in this category is forecasted to remain constant because the product categories will remain unchanged year over year.</p>	<p>In the next financial year, we will continue to conduct modern slavery specific supplier visits and on-site audits, including the engagement of 3rd party auditors as appropriate.</p> <p>We will also increase visibility into the sub-tier supply to understand the electronic components purchased by our tier 1 suppliers.</p>
 <p><b>Geographic</b></p> <p><b>Business Area:</b> Supply Chain - Direct</p> <p><b>Forced labour and/or child labour practices found within our suppliers' operations.</b></p>   <p>Contribute      Directly Linked</p>	<p><b>Hardware:</b> Most Hardware <a href="#">suppliers operate in locations</a> that have the lowest or medium prevalence of modern slavery. We do not have any Hardware Suppliers in the Xinjiang region of China, but we have been closely monitoring forced labour risks in China through our <a href="#">Modern Slavery Supplier Survey (Supplier Survey)</a>.</p> <p>When evaluating potential suppliers, we follow our <a href="#">due diligence process</a> to minimise this risk. Further we conduct regular on-going due diligence of current suppliers.</p> <p><b>Digital:</b> There are <a href="#">4 countries</a> in the Digital Supply chain, which provides mostly services, that are considered higher risk for modern slavery prevalence. We acknowledge this risk indicator.</p>		<p>This risk could increase in the next reporting period as some of our current suppliers are looking at opportunities to manufacture products for Aristocrat in new regions or countries that may have a higher prevalence of modern slavery.</p> <p>The Digital supply chain will look to leverage the actions and controls already in place for the Hardware supply chain to ensure an enterprise-wide approach to managing our supply chains.</p>	<p>We will continue to conduct modern slavery specific supplier visits and on-site audits. This includes proactive assessments prior to suppliers moving to facilities in a new country.</p> <p>We will continue to engage with the Sourcing Resiliency Team to gain greater visibility into sub-tier supply.</p> <p>In the next year we will look to identify and prioritise the inclusion of our ethical sourcing clauses in our key supplier agreements in the countries with higher prevalence of modern slavery risk.</p>

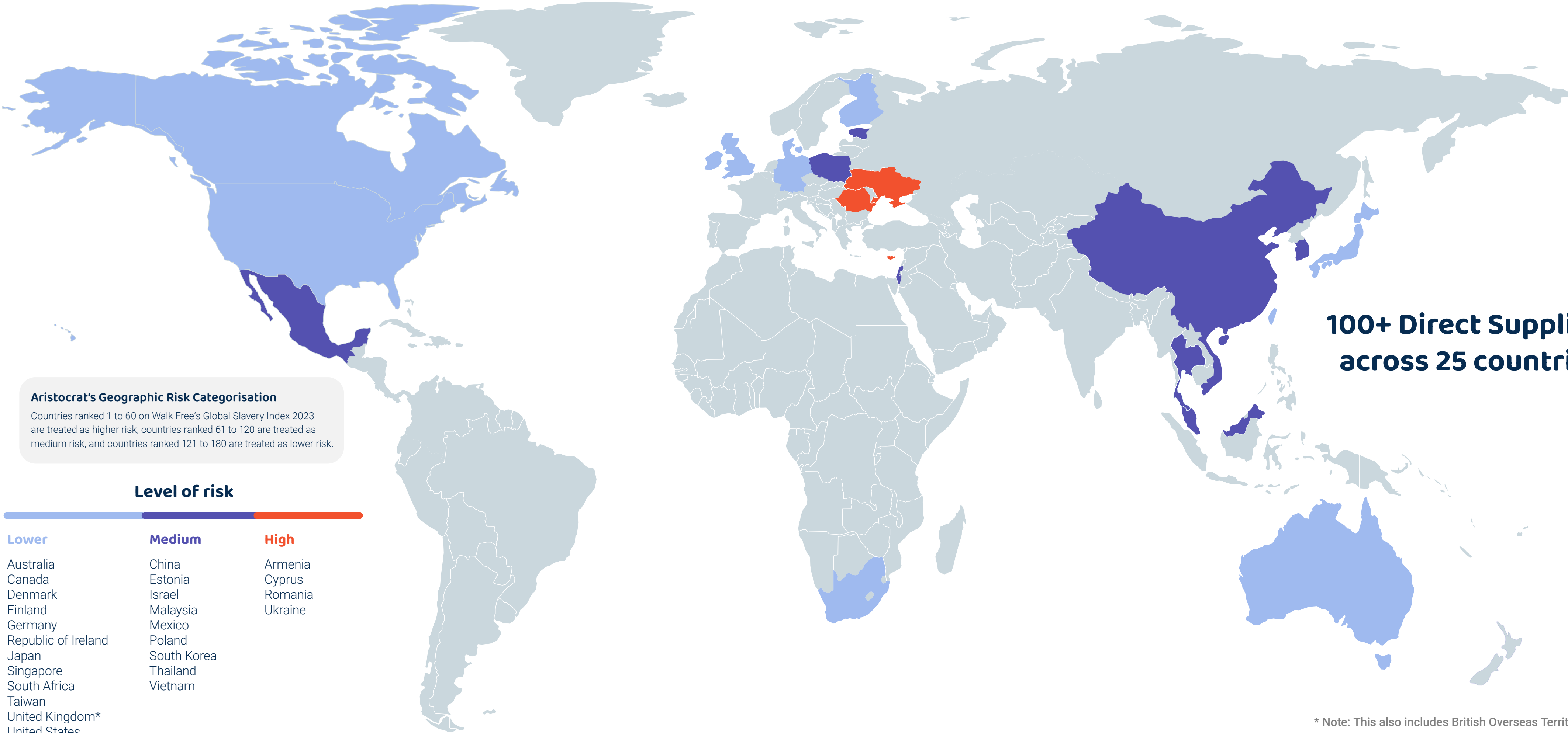


**B. POTENTIAL RISKS IN OUR SUPPLY CHAINS**

Risk	Current Risk Status & Mitigations	Projected Risk Change over Next Year	Projected Risk Change Rationale	Future Mitigations Under Consideration
<p> <b>Working Condition</b></p> <p><b>Business Area:</b> Supply Chain - Direct</p> <p><b>Employment practices for our direct suppliers' workers (permanent and/or contractors/ temporary workers) are not compliant with laws in the applicable jurisdictions.</b></p> <p> <b>Contribute</b>    <b>Directly Linked</b></p>	<p>We recognise that some locations in which our Hardware suppliers operate may afford relatively limited legal protections to workers, but one way in which we mitigate this risk is by requiring suppliers to use their best efforts to comply with harmonised minimum standards globally, as set out in our <a href="#">Supplier Code of Conduct</a>.</p> <p>Currently Aristocrat has visibility into the Hardware supply chain. As we continue to collaborate with these suppliers, we will gain additional visibility into their sub-tier suppliers to better identify and manage modern slavery risks in the lower tier supply.</p> <p>The Hardware supply chain has Master Supply Agreements (<b>MSA</b>) in place with suppliers covering 96% of our annual spend. The MSA includes specific ethical sourcing and anti-modern slavery clauses, including employment related clauses and also obligates these suppliers to comply with the Supplier Code of Conduct.</p> <p>We also conduct compliance probity checks for agreements of \$1 million or more. These include checks to identify any material litigation, enforcement actions or adverse media reports, including related to modern slavery issues. These compliance probity checks have been updated every 3 years. This will move to a 2-year cycle from financial year 2024.</p>	<p>↑</p>	<p>Although we believe the level of this risk may increase, our visibility of the risk within our supplier' operations will increase. We expect that as we continue to conduct compliance checks and on-site audits that there will be findings aligned with improving working conditions for their employees.</p>	<p>We will continue audits of Hardware suppliers in relation to compliance to the Supplier Code of Conduct. We may consider working with our tier 1 suppliers to conduct supplier surveys or audits of lower tier suppliers.</p>
<p> <b>Working Condition</b></p> <p><b>Business Area:</b> Supply Chain - Indirect</p> <p><b>Employment practices for workers hired through an indirect supplier are not compliant with laws in the applicable jurisdictions.</b></p> <p> <b>Contribute</b>    <b>Directly Linked</b></p>	<p>The below services were identified as higher risk given the reliance on casual/temporary workers, unskilled workers, and migrant workers, who may be more vulnerable to exploitation, including forced labour and debt bondage:</p> <ul style="list-style-type: none"> <li>• Cleaning services</li> <li>• Facilities management services (including catering, construction, maintenance and security services)</li> <li>• Warehousing, distribution, and transportation services.</li> </ul> <p>These services may be procured through our Indirect supply chain. To mitigate the risk of utilising Indirect suppliers engaged in modern slavery practices, the Indirect Sourcing team has included specific modern slavery questions as part of the Indirect request for proposal (RFP) process. Further, the Indirect Sourcing Policy points to our Anti Modern Slavery Policy to ensure modern slavery risks are considered during Indirect purchasing.</p> <p>Indirect sourcing activities managed via formal RFP in normal circumstances will also require a formal agreement between Aristocrat and the service provider. This provides us the opportunity to include ethical sourcing clauses in these agreements in a risk-based manner. In addition, the Purchase Order Terms and Conditions also include references to ethical sourcing including specific reference to modern slavery and the Supplier Code of Conduct, further obligating Indirect suppliers to meet these requirements.</p>	<p>→</p>	<p>Although the likelihood of the risk may not change in the next reporting period, we expect our ability to influence our suppliers will be greater due to an increase in the amount of spend being managed under a Purchase Order.</p>	<p>We plan to update the RFP questions to have additional modern slavery questions for the Indirect product and service categories that are at highest risk for modern slavery.</p>

We will continue to review the risks identified above and consider whether any new risks should be added in the future.

### Location of Key Direct Suppliers and Sub-Tier Suppliers (Hardware & Digital)



## 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](#), 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 details 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 modern slavery supplier survey — serve the dual purpose of allowing us to **both assess and address** identified risks.



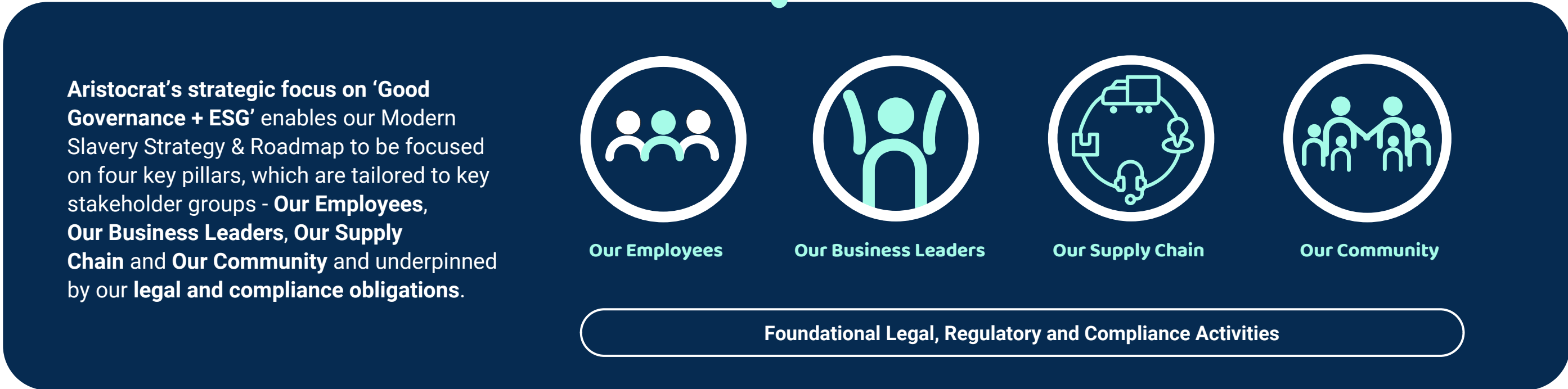
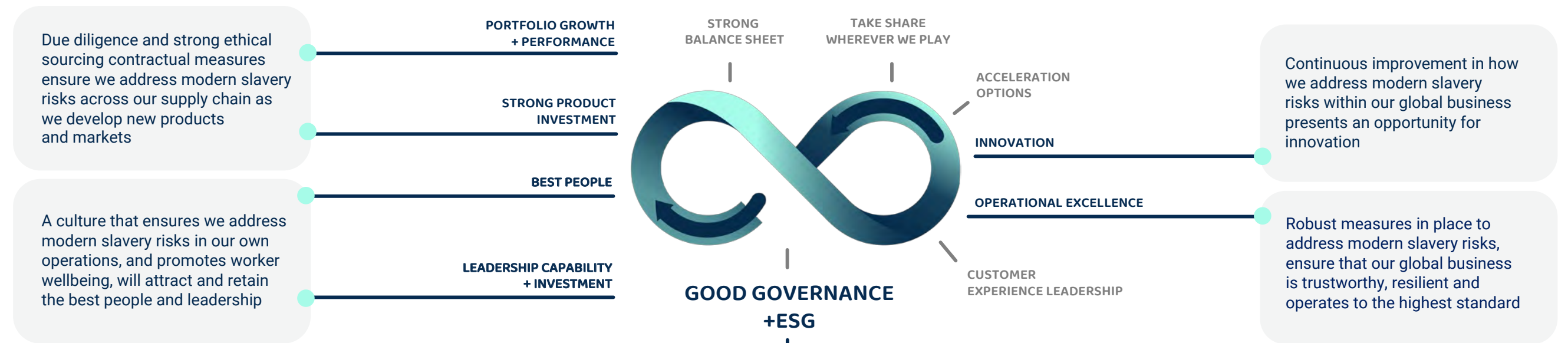
**A. APPROACH TO ASSESSING AND ADDRESSING RISKS <sup>7</sup>**

**Strategic Approach**

The Working Group continues to advance Aristocrat’s global anti-modern slavery program (**Anti-Modern Slavery Strategy and Roadmap**). The strategy underpins the activities in the roadmap and guides our decision-making in relation to our anti-modern slavery program. The Anti-Modern Slavery Strategy and Roadmap forms part of, and supports, the Group’s growth strategy, which is shown in the image to the right. Specifically, while the Anti-Modern Slavery Strategy and Roadmap touches all aspects of the Group’s growth strategy through ensuring business sustainability, there are some aspects of the growth strategy that are more directly impacted.

Further, the Working Group has benchmarked various aspects of the Group’s program against competitors and other businesses to continue its commitment to improvement in this space.

**Aristocrat’s growth strategy is supported by our Anti-Modern Slavery Program**

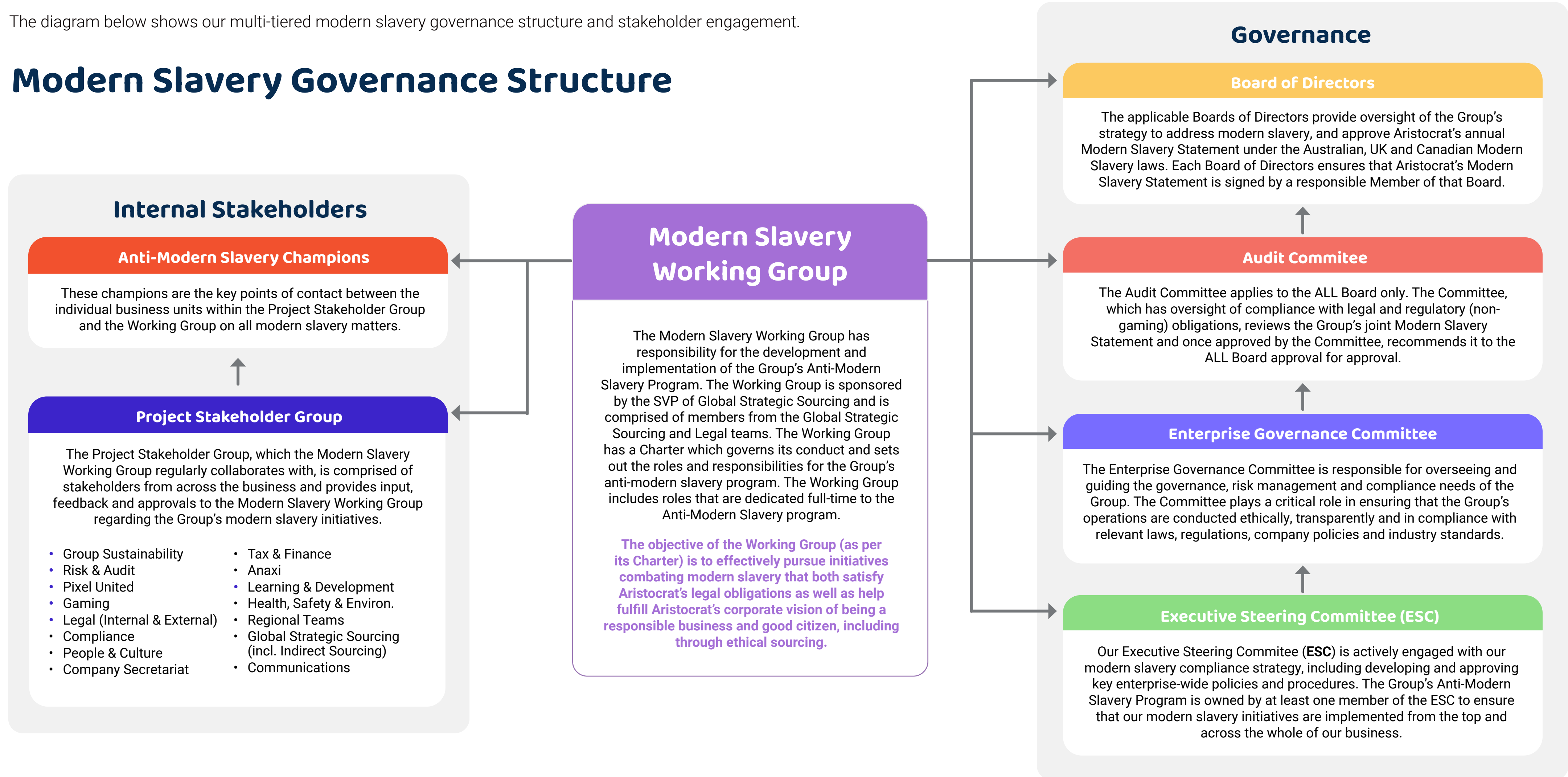


7. All entities in the Group are required to comply with our policies and procedures in this space (with limited exceptions, as noted in this Statement), which may be modified or localised to ensure they are “fit for purpose” based on specific business requirements, local laws and modern slavery risk profiles.

## Governance and Stakeholder Engagement

The diagram below shows our multi-tiered modern slavery governance structure and stakeholder engagement.

# Modern Slavery Governance Structure



**B. ACTIONS TAKEN TO ASSESS AND ADDRESS RISKS**

**1. Foundational Actions and Controls to Assess and Address Risks**

The information below details the foundational actions and controls used to assess and address risks. These actions and controls were in place prior to financial year 2023.

**a. Policies, Procedures and other Documents**

**Anti-Modern Slavery Policies**



Group employees are subject to the Anti-Modern Slavery Policies which:

- explains the concepts of modern slavery in layperson’s terms, without referring to specific legislative provisions;
- imposes a “zero tolerance” approach for modern slavery 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 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.

**Code of Conduct**



Group employees are required to comply with the Aristocrat Code of Conduct. It summarises important information to support all employees in having a common understanding of Aristocrat’s mission, values, key commitments and standards and rules that must be adhered to by all employees across the globe. This includes the Group’s commitment to continual improvement in its Anti-Modern Slavery Program through education, communication and collaboration.

Employees are required to read and acknowledge our most critical policies, including the Aristocrat Code of Conduct, when they commence employment with Aristocrat.

**Staffing Agreements**



For Aristocrat Gaming, all our key staffing agreement templates for contingent workers have been updated to require third-party recruitment/labour hire agencies to (a) pay wages without deduction (except as required by law), and (b) give Aristocrat access to the agency’s records to enable Aristocrat to verify that workers are being paid accordingly.

### M&A Due Diligence Process

Specific modern slavery questions are asked of potential target companies during the M&A due diligence phase.

The questions help Aristocrat gauge the level of modern slavery risk of the potential target company by understanding:

- the nature of the goods and/or services provided by the target company,
- nature of the target company's workforce,
- specific labour risks,
- modern slavery obligations, and
- risk identification and mitigation processes available via M&A and other enterprise-level processes.

### Compliance Questionnaire

Modern slavery specific questions are included in the compliance self-certification question set. This half-yearly self-certification is a questionnaire required to be completed by leaders globally within the Group. It contains a set of questions on key matters to ensure we operate appropriately, safely, and in compliance with regulations and policies.

### Indirect Sourcing Policy & RFP Process

The Indirect Sourcing Policy references modern slavery as a key consideration in responsible and ethical sourcing and links to our Anti-Modern Slavery Policy. The Indirect RFP process includes modern slavery risk questions for potential suppliers.

 Address  Assess



## b. Supplier Due Diligence

### Supplier Due Diligence Process



The supplier due diligence steps portrayed in the image (below) apply to all new and existing Gaming Key Direct Suppliers and Sub-Tier Suppliers engaged by Global Strategic Sourcing (**GSS**). It is composed of two key steps:

(1) pre-approval process – only after this process is completed are suppliers given the opportunity to bid on potential supplies for Aristocrat. The responses provided by the suppliers as part of this process (through surveys, assessments and audits) are critically reviewed and checked for completeness by Aristocrat.

(2) ongoing due diligence – ongoing checks are conducted after the pre-approval process is completed to ensure that suppliers retain the ability to supply products to Aristocrat. The due diligence process takes place every 24 months at a minimum, as required by policy, with the exception of probity checks which are undertaken every 36 months<sup>8</sup> at a minimum, as defined by Compliance policy.

Aristocrat Gaming aims to renew Supplier Due Diligence every 24 months. The components of the supplier due diligence process are further detailed on this page and the following pages.



### Supplier Self-Assessment



The GSS team (which sits within our broader Global Supply Chain team) requires completion of supplier self-assessments on the follow topics:

- supplier capability and production capacity;
- quality;
- Environmental, Social and Governance issues;
- workplace health and safety;
- financial health (completed by a third party); and
- Modern Slavery Supplier Survey

8. Note: The frequency of probity checks will change from a minimum of 36 months to 24 months in Financial Year 2024.



### Modern Slavery Supplier Survey



The Modern Slavery Supplier Survey requires Gaming Key Direct Suppliers and Sub-Tier Suppliers to respond to detailed questions specifically addressing modern slavery issues<sup>9</sup> to allow Aristocrat to understand how each supplier manages and responds to each of the below topics:

- nature of goods and services;
- nature of workforce;
- specific labour risks; and
- risk identification and mitigation.

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.

### Ethical Sourcing Clauses for Suppliers



All template Master Supply Agreements for our Key Direct Suppliers and Sub-Tier Suppliers, as well as global purchase order terms and conditions (which are utilised globally for a wide variety of day-to-day transactions by the business), include ethical sourcing clauses, which require suppliers to comply with all applicable modern slavery, human rights, conflict minerals and related laws. For 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.

### Supplier Code of Conduct



Our Supplier Code of Conduct articulates the Group's expectations for Hardware Suppliers and any other Gaming suppliers engaged via our Master Supply Agreements and purchase orders (including some Indirect Sourcing suppliers for Gaming) with respect to modern slavery, as well as several other labour, health and safety, and environmental standards.

In several respects, it requires suppliers to exceed minimum local legal standards, and to commit to using their best efforts to meet several aspirational standards (such as compliance with maximum working hours and industry standards relating to wages and benefits).

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 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.

Hardware Suppliers are provided with an electronic copy of the Group's Supplier Code of Conduct upon signing an agreement with Aristocrat.

9. The Supplier Survey also addresses the risks concerning the use of Uyghur forced labour in Xinjiang and other regions of China.

## Supplier Visits and Audits



Aristocrat’s Global Supply Chain management team conducts periodic site visits and audits to monitor Hardware Suppliers. The purpose of the supplier visits is to identify and understand potential matters identified in the supplier due diligence assessment, and the Modern Slavery Supplier Survey. Such audits are conducted in a risk-based manner, with a focus on the Key Direct Suppliers and Sub-Tier Suppliers that account for most of the Group’s direct spend.

Ahead of site visits, the Global Supply Chain management team reviews and refers to our “Guidance regarding supplier interactions on modern slavery issues” document. This guidance 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.

## Compliance probity checks



As part of our standard compliance procedures and onboarding process, a probity investigation is required for all new and current suppliers that Aristocrat expects to spend above AU\$1 million or US\$1 million in any calendar year. A specific check relating to modern slavery has been added to the probity investigation process which is coordinated by our Compliance team. This check uses publicly available information to identify any material litigation, enforcement action or adverse media reports relating to modern slavery issues that the supplier may have been involved in.

● Address ● Assess



## c. Grievance

### Grievance Reporting Process & Whistle Blower Program



Employees can report actual or suspected modern slavery incidents:

- to a dedicated email address monitored by key members of the Working Group. This email address is communicated to employees in the Anti-Modern Slavery Policies, the Modern Slavery Incident Response Guide, and our Anti-Modern Slavery training; and
- through Aristocrat’s Whistleblower Program either directly to certain senior management across the Group or through a confidential, independent communication service provided by a third-party ethics and compliance specialist.<sup>10</sup>

The Whistleblower Program is communicated to employees through the Aristocrat 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.

### Global Whistleblower Policy



Aristocrat’s Global Whistleblower Policy is our key global grievance mechanism and is designed to:

- encourage people to raise concerns about reportable conduct;
- inform people that a framework exists to protect them from detrimental treatment which may be suffered by them as a result of raising a concern; and -
- outlines how Aristocrat will respond to concerns raised.

The global service is available 24 hours a day, 7 days a week and can be accessed online or by phone. Modern slavery grievances can be raised either through this channel or directly to certain senior management across the Group.

The Global Whistleblower Policy is available on Aristocrat’s website.

### Modern Slavery Incident Response Guide



The Modern Slavery Incident Response Guide (**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.

10. Note: reports can also be made to eligible recipients including senior leaders and Group Risk and Audit

### d. Training

#### Modern Slavery Prevention Training



Aristocrat has implemented general modern slavery prevention training for all Aristocrat employees globally, and the ALL Board. This training is also included as part of mandatory training for all newly onboarded employees. The training focuses on how employees can identify and report potential modern slavery.

### e. Other

#### External Legal Advice



Given the evolving legal obligations and reviews of modern slavery laws across multiple jurisdictions, the Working Group continues to engage external legal experts in Australia, the UK, and Canada to inform the Group's approach to modern slavery compliance.

● Address ● Assess





## 2. Updates in Financial Year 2023

The below section details the updates, improvements and additions we have made to our foundational controls and actions to assess and address risk since our last statement.



We recognise that Modern Slavery risks may be inherent in all aspects of business, and we also acknowledge that Aristocrat's supply chain is a large area of risk and where we can make the biggest impact. Collaborating closely with our suppliers the Working Group has developed a specific and robust Risk Management Model for our Key Direct and Sub-tier suppliers, to improve our oversight, increase our visibility and understand the potential risks in our supply chain. This Risk Management Module provides the ability to categorise the likelihood and impact of potential Modern Slavery risks in our supply chain to create a focussed and prioritised program to mitigate risk by implementing actions and controls to ensure Aristocrat business does not have deleterious effects on working conditions throughout our supply chain.

- Gary Toms, Senior Vice President Global Strategic Sourcing.



The  shows actions that have been newly implemented in Financial Year 2023



This diagram details the additional actions we have taken to better understand the risk of modern slavery within our supply chain ecosystem.

**Activity**

**Major Uplift to our Supplier Survey - Pilot Group**      **Pilot Suppliers then Received On-Site Compliance Check/Audits**

- Refocused question set on high risk supplier activities and locations.
  - Redesigned question set ensured that responses from the suppliers were both auditable and actionable.
  - Question set was rewritten to be in simple language to consider those who many not speak English as a first language.
  - Pilot group of 5 suppliers were sent the survey so Aristocrat could collect feedback from suppliers to ensure understanding of survey question intent.
- On-site audits were conducted at 5 suppliers across various product categories and levels of supplier complexity.
  - The suppliers were audited against the Supplier Survey and the Supplier Code of Conduct.
  - Transparent discussions were held with key leadership at each supplier to understand the methodology and evidence for the survey responses that were provided by the supplier.

**Actionable Insights**

The audit and clarifying discussions enabled Aristocrat to better understand the suppliers' level of modern slavery risk awareness as well as where there are opportunities to further collaborate and mitigate their risk of modern slavery.

- Where any confusion about survey question intent existed, there was a discussion, the question was updated before being sent to all suppliers, and the suppliers' responses were updated to accurately reflect the intended question.
- After the on-site visits there have been on-going discussions with the suppliers about any findings to both identify and status the progress of actions jointly agreed to in order to mitigate their modern slavery risk.
- Where requested, Aristocrat has shared tools and methodologies with suppliers to support the uplift of their modern slavery risk mitigation programs (e.g. suppliers have requested our Supplier Survey question set to update contracts and purchase orders with their own suppliers; another supplier has already actioned improvements for the age validation process for their new hires).

**Revised Supplier Survey**

- Used insights and lessons learned from the pilot group and applied them to the broader supplier set.
- An online platform was used to send the Supplier Survey to all Key Direct Suppliers and Sub-tier Suppliers which enabled analytics for risk modeling.

The supplier responses allowed us to understand the supplier modern slavery risk from a number of lenses including:

- geographic risk for both the supplier and their supply chain,
- product risks, and
- working condition risk (both permanent and 3rd party hire employees).

Using the data from the supplier survey we applied a weighting to the responses relating to the level of risk. These weighted responses were then used to develop a holistic view of each suppliers' inherent likelihood of modern slavery risk.

We will continually improve all components of this ecosystem and use this system to drill down into our suppliers' suppliers to gain visibility, including expanding this model across the enterprise.

**Modern Slavery Risk Management Model**

Inputs from the supplier survey (likelihood of risk) and Aristocrat's strategic supplier rationale (impact) have enabled us to create an inherent risk level for each supplier.

We have prioritised and targeted specific suppliers for immediate action who are most at risk. We are working with these suppliers to jointly create action plans to mitigate their modern slavery risk to a target risk level.

**Risk Cube**

		Likelihood of Modern Slavery Risk				
		Rare (0-1)	Unlikely (1-2)	Possible (2-3)	Likely (3-4)	Almost Certain (4-5)
Impact of Modern Slavery incident to Aristocrat Gaming	Severe (4-5)		1 Supplier			
	Major (3-4)		2 Supplier	1 Supplier		
	Moderate (2-3)	1 Supplier	11 Supplier	5 Supplier		
	Minor (1-2)		4 Supplier	2 Supplier		
	Not Significant (0-1)		6 Supplier	8 Supplier		

Note: The main objective of this risk cube is to reduce the likelihood of a modern slavery risk. The number of suppliers in the above risk cube is notional and not representative of current state.

The insights from the Modern Slavery Risk Management Model have driven the below key future activities:

**Updated Supplier Code of Conduct**      **Supplier Collaboration**      **3rd Party Audit Program Under Development**

Aligned to our strategy and including insights gained during the Supplier Survey and on-site audits, Aristocrat is currently updating our Supplier Code of Conduct to provide further clarity to our suppliers. We will continue to communicate our expectations of suppliers related to the importance of their modern slavery risk management.

Where opportunities exist to improve our suppliers' identification and awareness of modern slavery risk, Aristocrat will continue to collaborate and share tools and processes where applicable.

To progress our continuous improvement in understanding beyond Tier 1 suppliers, we have engaged a 3rd party to assist in global on-site audits of modern slavery risk. This engagement will ensure best practice human rights assessments are engaged, cultural differences and local languages are considered, and remove potential conflict of interest between supplier and customer.

### CASE STUDY

After receiving responses from the updated Modern Slavery Supplier Survey, an on-site audit was conducted on the 5 Hardware suppliers. The 5 suppliers were identified as the pilot group for the Modern Slavery Supplier Survey. The audit methodology rigorously tested the suppliers' responses and compliance to Aristocrat's Supplier Code of Conduct, requiring evidence to demonstrate the validity of suppliers' responses.

There were multiple findings across the 5 audits. Some examples of these findings and the actions taken include:

- **Policy to cover modern slavery risk:** One supplier had indicated their policy was a finalised and published document. Upon request to sight the document during the audit, it was discovered that no published document existed. Instead, this brought to light that the document was only in a draft stage. Actions were taken by the supplier to commit to a date to publish their policy.
- **Validation of ages:** Many suppliers have indicated that ages were captured during the hiring process (i.e., employees were asked to list their date of birth), but there was not sufficient evidence to demonstrate the ages were validated. In these cases, actions have been assigned to update their processes to include at a minimum the sighting of a formal identification document with proof of age by an authorised company representative.

In the case of findings, we were pleased with the suppliers' response which was that of appreciation for bringing to light these findings. We believe these positive results were due to clearly stating the intention of the audits was to seek to understand and to collaboratively work to improve the holistic system, and we were not looking to penalise the suppliers.

“ I appreciated the conversation as it brought up some interesting points about modern slavery. Once again, I must say, Aristocrat truly stands out among other Tier 1 customers. ”

Quote from an audited supplier representative



Additional updates to our foundational actions and controls that have been made since the last statement include:

## b. Policies, Procedures and other Documents



### Anti-Modern Slavery Policies

To enhance accessibility to the Anti-Modern Slavery Policies, we have translated the Anti-Modern Slavery Policies to the most prevalent languages for our workers.



### Staffing Agreements

Staffing agreement template clauses consistent with our ethical sourcing expectations were drafted and included in a Reference Guide prepared for the Legal team.



### M&A Due Diligence Process

The Working Group participated in the due diligence phase of the acquisition for Roxor and the proposed acquisition of NeoGames.



### Compliance Questionnaire

There were no exceptions reported for the Modern Slavery Awareness questions in the Financial Year 2023 self-certification questionnaire.



### Code of Conduct

During the year, the Group's Code of Conduct was refreshed, in order to ensure that the Code remained relevant and readily understood by all employees across the globe.

The Code of Conduct is available in various local languages to reflect the diversity of our employee base.

Aristocrat's effectiveness in maintaining a safe and healthy workplace for its staff has been recognised in India with Aristocrat India being recognised in India's Top 25 Best Workplaces in Diversity, Equity, Inclusion and Belonging 2023 as part of the 'Great Place to Work assessment'.

Great Place to Work (GPTW) is a global authority on workplace culture, employee experience and leadership. Aristocrat India was recognised for inspiring trust among its people, instilling pride, creating an environment that promotes camaraderie and delivering a great workplace experience for all employees.





### c. Additional Supplier Due Diligence



#### Ethical Sourcing Clauses for Suppliers

New template agreements for Aristocrat Gaming and Pixel United incorporating our ethical sourcing clauses have been drafted for use by the Legal team. They will progressively be incorporated into our ethical sourcing clauses. Where agreements are based on supplier terms or are otherwise the subject of negotiations with the counterparty, we will seek to ensure appropriate ethical sourcing clauses are included, having regard to the risks presented by the particular agreement.



#### Supplier Code of Conduct

After a subject matter expert third party review, Aristocrat’s Supplier Code of Conduct was found to demonstrate appropriate obligations in most areas. There was guidance to increase the obligations of our suppliers related to grievance mechanisms which Aristocrat plans to add for the next update.



#### Compliance Probity Checks

The Working Group has worked with the Compliance team to extend supplier probity in the event of any higher-risk locations, products and services, for example:

- The agreement relates to the supply of potentially higher risk goods, such as electronics, lithium-ion batteries, silica-based products, food products, textiles, coal, rubber, timber, gold, cobalt, or diamonds.
- The supplier is the party engaged in harvesting, processing or manufacturing the goods that they are supplying, as opposed to an intermediary such as a wholesaler.
- The supplier is harvesting, processing or manufacturing the goods in China or one of the higher risk countries in which modern slavery is understood to be more prevalent according to the Global Slavery Index.

### d. Grievance



#### Global Whistleblower Policy

During the year, the Global Whistleblower Policy was updated to incorporate some country specific updates where related laws may affect the application of Aristocrat’s Global Whistleblower Policy.



#### Modern Slavery Incident Response Guide

The Working Group held an information session for senior leaders to review the Guide and to discuss their roles in the event of a potential modern slavery incident.

## e. Training



### Modern Slavery Prevention Training

We have successfully completed our supplementary modern slavery training for:

- Key Supplier-facing employees, with **100%** of those allocated the training passing the assessment for this training module. The training focused on potential modern slavery and human trafficking risks in our supply chains, explained our contracting standards for suppliers, and discussed case studies.
- Key People & Culture employees, with **97%** of those allocated the training passing the assessment for this training module. The training was designed for members of our People & Culture Team who work on recruitment. The training focused on potential modern slavery and human trafficking risks in our recruitment processes and discussed case studies.
- We have also reassigned the general modern slavery training to **100%** of the ALL Board of Directors, ensuring that all new and existing directors have successfully passed the training module assessment.

## f. Other



### External Legal Advice

The Working Group engaged external legal advisers in Canada following the introduction of Canada's new law, Fighting Against Forced Labour and Child Labour in Supply Chains Act.



### 3. 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 nongovernmental organisations. With the addition of the requirements of the new Canadian Modern Slavery Act this year, we have also reviewed these four key principles against the requirements of the new Canadian Modern Slavery Act. The four key principles are:

1. remediation actions should **consider the best interests of actual or suspected victims** – this includes recognition that immediate termination of our relationships with suppliers that are alleged to have engaged in violations of our standards may not be the most appropriate course of action, and could subject victims to even greater harm;
2. remediation actions should be **designed to prevent ongoing harm**, and to **provide redress for past harm**;
3. wherever possible, remediation actions should be **collaborative** and will be most effective when they are developed in collaboration with our suppliers; and
4. 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.

These principles are contained in the [Incident Response Guide](#), providing guidance on responses to actual or suspected modern slavery incidents. These include how we develop and implement plans to ensure that incidents are not repeated and enable remediation for the victim.

The Group acknowledges the importance of collaboration and partnership with suppliers, particularly in relation to Aristocrat's first key remediation principle, to consider the best interests of actual or suspected victims. In the event of a modern slavery incident, either at the tier one or sub tiers levels, we have contractually obligated our suppliers to:

- report an incident to Aristocrat within 48 hours, and
- provide unhindered support of an investigation, including a root cause analysis and the implementation of appropriate remediation measures.

The Group did not receive any reports of modern slavery incidents in its operations or supply chain during this reporting period, however we acknowledge the known scale of modern slavery globally and the likelihood that any business could be impacted. As we progress our roadmap increasing awareness, improving visibility in our operations and supply chain and having shared reporting mechanisms with our suppliers, we expect to receive reports of actual or suspected modern slavery incidents and are committed to respond to any reports in an appropriate manner that is consistent with our incident response guide.

### 4. Measures Taken to Remediate

The Group did not identify any specific incidents of modern slavery, such as forced or child labour, in our operations or supply chain in Financial Year 2023. Accordingly, no measures were required to be taken in Financial Year 2023 to remediate loss of income incurred by the most vulnerable families that may result from any measures taken to eliminate the use of forced or child labour in our operations or supply chains.

While no modern slavery incidents were reported, as part of the supplier audits carried out in Financial Year 2023, the Group did identify an area for a supplier to [remediate the supplier's processes](#). This related to a supplier who only had a draft (unpublished) anti-modern slavery policy. As per the terms of Aristocrat's Supplier Code of Conduct, we collaborated with the supplier to ensure a policy was approved and published.

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

We believe that the combination of preventative, detective and corrective mitigants covered in the section above [Section IV](#) is effective at assessing and addressing our risk.

Consistent with previous reporting periods, in Financial Year 2023, the Working Group (in consultation with a variety of relevant stakeholders as set out in [Section IV](#)) has assessed the effectiveness of Aristocrat's approach to mitigating modern slavery risks which is based on the Key Performance Indicators (**KPIs**) below, which were first set out in 2019 and tied to specific objectives for the early years of the modern slavery program. The effectiveness of our actions is assessed against the KPIs on an annual basis. In our last statement we proposed an additional KPI relating to supplier audits which has been added to the below list of KPIs.

“






The Anti Modern Slavery Program has brought to life where modern slavery risk can be impacted by our business decisions. The recently implemented P&C supplementary training helped both my team and I better understand specific risks around hiring practices and increased the awareness of my team. Combining this training with the Anti Modern Slavery Summit last year, the general training all employees have received, and the awareness event with St. Jude's Ranch for Children, I have the information and awareness to feel more confident about incorporating modern slavery considerations into my team's business decisions

”

- People & Culture Executive



## A. Modern Slavery KPIs

Key Objective Category	Key Performance Indicator Definition	Summary of performance Financial Year 2023		
Employee training and awareness.	The percentage of Group employees, who have <b>successfully completed modern slavery training</b>			
<p>Consistent application of the Supplier Code of Conduct and the ethical sourcing contractual safeguards.</p> <p>New KPI: Completion of 5 Key <b>Direct Supplier Audits</b></p> 	<p>The percentage of the Group's Key Direct Suppliers and Sub-Tier Suppliers that are <b>signatories to the ethical sourcing contractual safeguards</b> or otherwise subject to the <b>Supplier Code of Conduct</b>.</p>		<ul style="list-style-type: none"> <li>Findings from these audits have been identified and remediation actions are underway. We will provide details about the action plans in the future statements.</li> </ul>	
Prompt investigation and remediation of reported modern slavery incidents.	The percentage of <b>investigations and required remediation</b> for modern slavery incidents that comply with our Incident Response Guide.	<ul style="list-style-type: none"> <li>The Group did not identify any specific incidents of modern slavery in our operations or supply chain in Financial Year 2023.</li> </ul>		

11. While training completion figures for Plarium staff are unavailable due to system differences, general modern slavery training has been distributed to Plarium employees and is also included in the onboarding package for all new Plarium employees as a mandatory requirement.

We are also pleased to report an increase in the effectiveness of our actions to improve employee awareness demonstrated by our senior executives taking ownership of our key internal modern slavery risks. Their ownership signals the importance of managing these risks to all employees.

### CASE STUDY

We have also received qualitative feedback about the effectiveness of our enterprise-wide approach to managing modern slavery risk.



**In past years, Pixel United and Gaming have found new opportunities to collaborate and improve business operations to achieve shared strategic goals, including assessing and minimizing business risk. Specifically in the last year, we (Pixel United and Gaming), have identified and shaped our risk review framework and mitigation strategies as it relates to modern slavery. Anti-modern slavery and its associated risks are at the forefront of Pixel United and Gaming compliance and has become an ongoing strategic initiative that we will continue to invest in.**



Pixel United Legal Counsel

We continue to engage with the community, including modern slavery subject matter experts to consider how to continually improve our capabilities and effectiveness for managing these risks both within our internal operations and our supply chain. We are pleased to receive questions from our customers and investors about our Anti-Modern Slavery Program as their questions and feedback provide additional considerations to the effectiveness of our program.

Aristocrat continues to periodically review the KPIs listed above to determine whether they continue to represent appropriate criteria for measuring the effectiveness of Aristocrat's efforts to mitigate modern slavery risks.

In addition to our own internal assessments, we rely on a range of independent assessments (such as reports from independent third parties like universities and other bodies that assess the quality of disclosures), as well as our external legal support, to assess the effectiveness and quality of our approach to mitigating modern slavery and human trafficking risks. We continue to consider the reports published by Monash University and Australian Council of Superannuation Investors as part of our approach.

## VI. Consultation

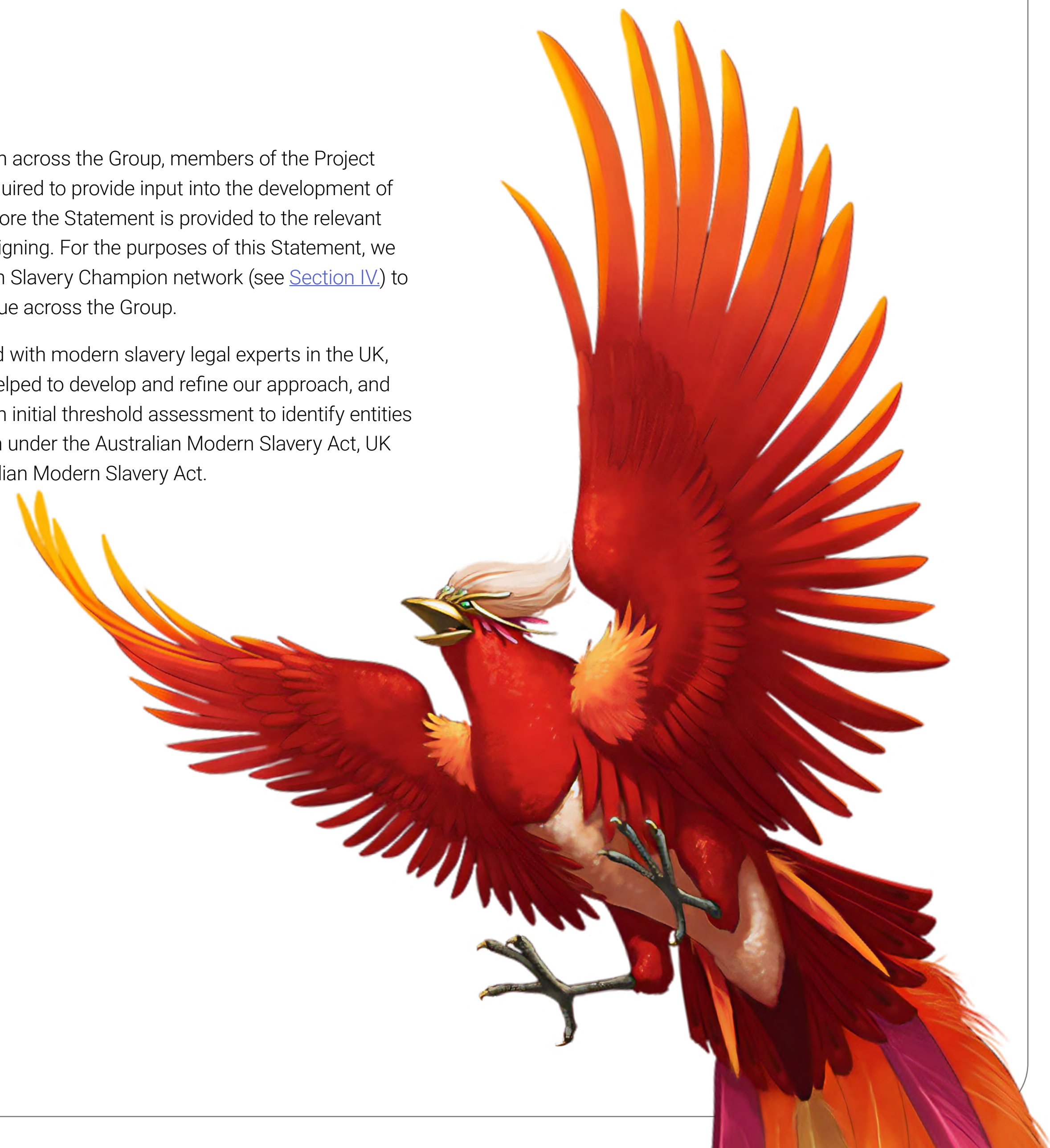
In accordance with the Australian Modern Slavery Act and relevant government guidance on consultation, we developed this joint Modern Slavery Statement in consultation with each of the Aristocrat Australian Reporting Entities, the UK Reporting Entities and the Canadian Reporting Entities and all entities 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, the Canadian Modern Slavery Act or the UK Modern Slavery Act, consideration of how modern slavery risks vary across the Group, implementation of a Groupwide risk assessment process which is being rolled out as outlined in Sections III and IV, and ongoing agreement on our future roadmap for the next reporting period as further described in Section VII.

Aristocrat also separately consulted with the wider Group. This included tailored communication with Pixel United and Anaxi, recognising that the risk profile of Pixel United and Anaxi 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.

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. For the purposes of this Statement, we also leveraged our Anti-Modern Slavery Champion network (see Section IV) to ensure full and effective dialogue across the Group.

Our Working Group has worked with modern slavery legal experts in the UK, Canada 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, UK Modern Slavery Act and Canadian Modern Slavery Act.



# VII. Other important information

## A. ENGAGEMENT, COLLABORATION AND STATEMENT ENHANCEMENTS

We are pleased with the on-going engagement we have seen from within the business, our supply chain and the community. We have noted some of these engagements through the document:

- [Increased collaboration with Pixel United and Anaxi](#), especially in relation to managing supply chain risk
- Collaboration with the [M&A team on pre-acquisition due diligence](#)
- [Our cross-over events Anti-Modern Slavery Champions and Aristocrat CSR volunteering](#) and
- [Supporting our Hardware suppliers to assess and address risk](#)

In Financial Year 2023, in addition to our Group consultation process, Aristocrat has taken further steps to engage with suppliers and external subject matter experts (as mentioned in [Section V](#)), to inform and further enhance our approach to addressing modern slavery risk.

Based on the recommendations from these evaluations and feedback, this Statement includes several enhancements compared to prior years, including:

- Modern slavery prevalence levels for the countries in which we have employees
- New and improved [supply chain metrics from Pixel United and Anaxi](#), enabling an enterprise-wide view of our supply chain.

- Details about the [complexities within our supply chain](#).
- [Risk tables in Section III](#) more clearly articulates the specific risks of modern slavery in both of our operations and supply chain.
- [Risk tables in Section III](#) include projections of the likelihood of risk changes in the coming financial year, including our proposed mitigation strategies
- [Details in Section IV](#) more clearly illustrate where our actions assess or address the risks in our business and supply chain.
- The [Supply Chain Modern Slavery Risk Ecosystem](#) infographic demonstrates the holistic supply chain focus for modern slavery risk and discusses our modern slavery risk management model.
- [Clarified KPIs in Section V](#), and included a new KPI for supplier audits

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 governments around the world in respect of compliance with modern slavery laws. We have used this guidance, where appropriate, to help draft this Statement and inform our approach to apply both the letter and the spirit of the law. The Group regularly reviews changes and developments in modern slavery and human trafficking laws and relevant guidance issued by governments and others.

We acknowledge that global modern slavery laws are currently under active review, and we are monitoring these reviews for key changes. In particular, we have paid close regard to the recommendations following the review of the Australian Modern Slavery Act. Our future actions and reporting periods will be informed by the outcome of this review.

We also regularly monitor developments in modern slavery laws globally.



## C. RELEVANT MATTERS IMPACTING OUR BUSINESS <sup>12</sup>

### 1. Ukraine conflict

The impact of the ongoing war in Ukraine on employees was identified as a risk area due to the correlation between conflict and the vulnerability of civilian populations to modern slavery.

Prior to the conflict, approximately 1,000 people working for business units within Pixel United were located in Ukraine. Specifically, the business has offices in Lviv, Kyiv and Kharkiv, with further employees working in remote locations across the country. Aristocrat has taken steps to assist Ukraine-based employees and their families to voluntarily relocate, either internationally or to safer locations within Ukraine.

To provide a permanent base for those who have relocated overseas, and to expand and further diversify the company's development capabilities in global game talent hubs, four new studios have been opened across Poland, Spain and Canada. Where possible, supplier relationships in Ukraine have continued. We closed our studio in Krasnodar, Russia, and suspended all supplier relationships in the country. Aristocrat currently has no ongoing presence in or exposure to the Russian market. In addition, supplier relationships in Belarus have also come under review. Due to the ongoing conflict, we have terminated and, in some cases, suspended supplier relationships in that region and will continue to assess the conflict and any related risks presented.

While the situation remains dynamic, the business has implemented an effective continuity plan enabling it to manage the disruption and continue to operate by delivering digital gaming content, as well as live operations and features across the portfolio.

12. We acknowledge the recent conflict in Israel that commenced in October 2023. As this timeframe is part of Aristocrat's 2024 Financial Year it is not covered in this year's statement and will be appropriately referenced in our next statement.

**D. LOOKING AHEAD - OUR FUTURE ROADMAP**

We have considered whether our current risk levels are likely to stay constant or increase in the next financial year. We will implement those proposed actions when and if necessary to address our risks. They are outlined under the column [“Future Mitigations Under Consideration” in Section III](#). While reviewing our current and potential future risks against our current actions and controls to assess and address those risk in [Section IV](#), we may consider the following actions for the future roadmaps:



**Our Employees**

- Provide supplemental modern slavery training to key staff who respond to whistleblowing complaints.
- Develop a global policy regarding donations of goods, collaborating with our Marketing and CSR teams.



**Our Business Leaders**

- Conduct test scenarios relating to a hypothetical modern slavery allegation and gather feedback from key responsible parties.
- Work with both our M&A and P&Cs teams to ensure the post-acquisition Integration Playbook aligns with the modern slavery protocols that exist enterprise wide.
- Continue to work with the Indirect Sourcing team to enhance our modern slavery RFP questions to reflect additional scrutiny for high-risk indirect categories.



**Our Supply Chain**

- Share our Whistle Blower hotline with suppliers so they can communicate any potential incidents of modern slavery within our supplier chain (our suppliers’ operations). Aristocrat will make country specific telephone numbers available for all countries where we have Hardware suppliers.
- Publish an updated GSS Due Diligence Process.
- Publish the next iteration of our Supplier Code of Code. The updates will incorporate stronger modern slavery risk mitigation obligations from our suppliers and include a communications plan to our suppliers.



**Our Community**

- We will uplift our modern slavery risk audit capabilities, working with subject matter experts from the community. This includes the delivery of a signed scope of work with consultants who are subject matter experts to deliver a formal review of our internal frameworks and systems, and to conduct on-site audits
- Continue to consider how to best support organisations that align with our values

## VIII. Addressing mandatory criteria

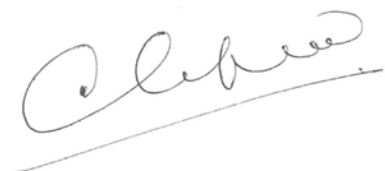
The table below helps illustrate where you can find the criteria for the Australian Modern Slavery Act, the UK Modern Slavery Act and the Canadian Modern Slavery Act addressed in this Statement.

Section in Modern Slavery Statement	Australian Modern Slavery Act	UK Modern Slavery Act	Canadian Modern Slavery Act
<a href="#">Page iii</a>	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 statement must include information about the organisation's structure, its activities and its supply chain (Section 11(3)(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 statement must include information about the parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk (Section 11(3)(c))
<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 statement must include information about: (a) the organisation's policies and its due diligence processes in relation to forced labour and child labour; (Section 11(3)(b)) (b) training provided to employees on forced labour and child labour; (Section 11(3)(f)) (c) any measures it has taken to remediate any forced labour or child labour; and (Section 11(3)(d)) (d) any measures it has taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chain. (Section 11(3)(c))

Section in Modern Slavery Statement	Australian Modern Slavery Act	UK Modern Slavery Act	Canadian Modern Slavery Act
<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 statement includes information about how the organisation assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chain. (Section 11(3)(g))
<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))	The statement must be approved by the organisation's governing body. The statement must include: A statement that sets out whether it was approved pursuant to the approval of the governing body; and The signature of one or more members of the governing body of each part of the organisation/subsidiary that approved the statement.

## 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 Aristocrat Global Holdings Pty Ltd was approved by the Board of Aristocrat Leisure Limited as the parent entity on 21 February 2024, 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

**21 February 2024**

Date



Signature

**Trevor Croker**

CEO and Managing Director

**21 February 2024**

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 25 March 2024, 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

**25 March 2024**

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 25 March 2024, 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

**25 March 2024**

Date

In accordance with section 11(4)(b)(i) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 this Modern Slavery Statement was approved by the Board of Aristocrat Technologies Canada, Inc. on 25 March 2024, and the Board has authorised Craig Toner, a director of the board, to sign this Modern Slavery Statement on behalf of Aristocrat Technologies Canada, Inc:

In accordance with the requirements of the Canadian Modern Slavery Act and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for Aristocrat Technologies Canada, Inc. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purpose of the Canadian Modern Slavery Act for the reporting periods ended 30 September 2023.

I have authority to bind Aristocrat Technologies Canada, Inc.



Signature

**Craig Toner**

CFO and EVP Operations

**25 March 2024**

Date

In accordance with section 11(4)(b)(i) of the Fighting Against Forced Labour and Child Labour in Supply Chains Act 2023 this Modern Slavery Statement was approved by the Board of Aristocrat Technologies, Inc. on 25 March 2024, and the Board has authorised Craig Toner, a director of the board, to sign this Modern Slavery Statement on behalf of Aristocrat Technologies, Inc:

In accordance with the requirements of the Canadian Modern Slavery Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for Aristocrat Technologies, Inc. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purpose of the Canadian Modern Slavery Act for the reporting period ended 30 September 2023.

I have the authority to bind Aristocrat Technologies, Inc.



Signature

**Craig Toner**

CFO and EVP Operations

**25 March 2024**

Date

The image shows a server room with rows of server racks. The racks are filled with various components, including cables and hardware. The lighting is dim, with a blue tint. The Aristocrat logo, consisting of the word "ARISTOCRAT" in a stylized font with a white circle above the "O", is centered over the image. Below the logo, the website address "www.aristocrat.com" is displayed in a smaller, white font.

ARISTOCRAT™  
www.aristocrat.com