

2025

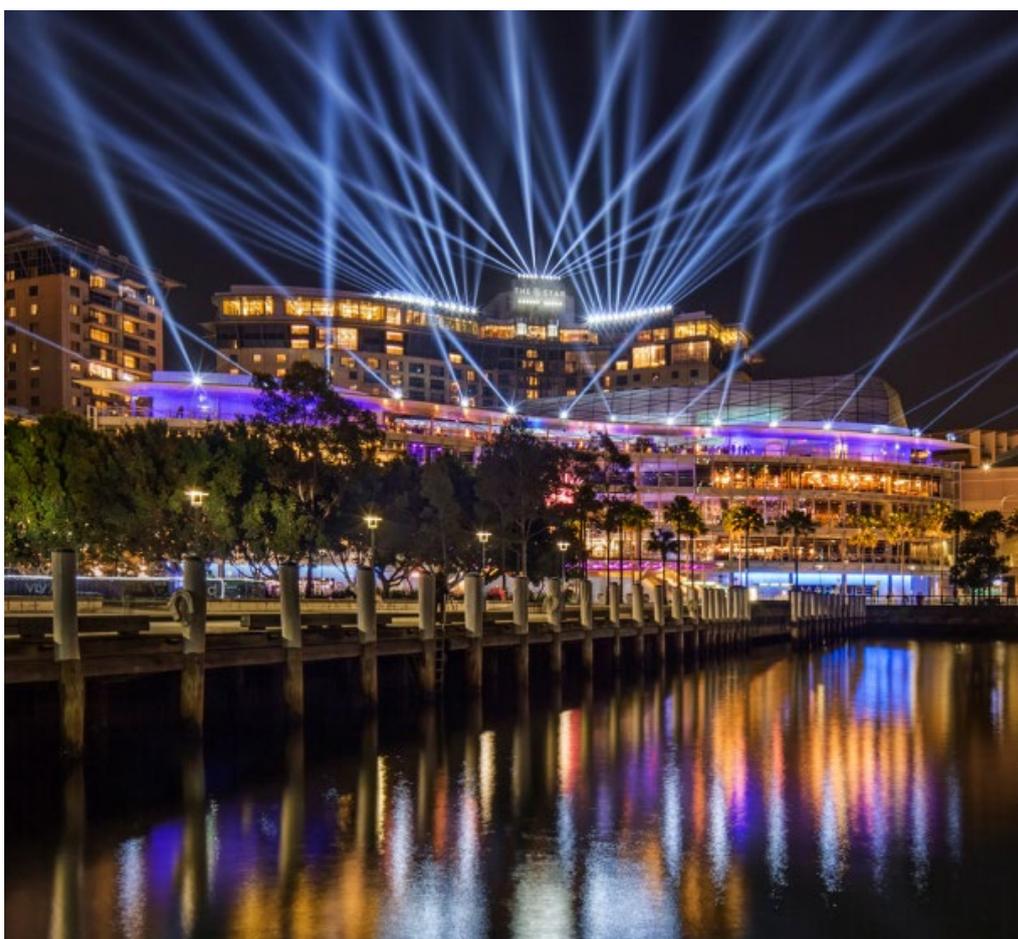
**Modern
Slavery
Statement**

ABOUT THIS STATEMENT

This statement, pursuant to the Australian Modern Slavery Act 2018 (Cth) (Act), describes the activities undertaken by The Star Entertainment Group Limited ABN 85 149 629 023, The Star Entertainment Sydney Holdings Limited ACN 064 054 431, The Star Pty Limited ABN 25 060 510 410, The Star Entertainment QLD Limited ABN 78 010 741 045, The Star Entertainment Brisbane Holdings Pty Ltd ACN 608 155 540, The Star Entertainment Brisbane Operations Pty Ltd ACN 608 159 173, and The Star Entertainment Finance Limited ACN 150 211 368 (*“The Star” or the “Company” and, together their controlled or owned entities, the “Group”, “we” and “our”*), to assess and address modern slavery risks in our business, operations, and supply chain for the financial year 1 July 2024 to 30 June 2025. The Star Entertainment Group Limited is the parent company of The Star Pty Limited and The Star Entertainment QLD Limited, with each of these entities meeting the reporting threshold requirements of the Act. This Statement has been approved by The Star Entertainment Group Limited’s Board of Directors and signed by the Group Chief Executive Officer and Managing Director.

The Star respectfully acknowledges the Traditional Owners of the Countries on which our properties are located, the Turrbal and Jagera People of the Brisbane region, the Yugambeh Speaking People of the Gold Coast region, and the Gadigal People of the Eora Nation in Pyrmont.

We acknowledge their deep and continuing connection to land, waters and skies. We pay our respect to Elders, past and present.



CONTENTS

ABOUT THIS STATEMENT	2
CONTENTS	3
CRITERION 1: REPORTING ENTITY: THE STAR ENTERTAINMENT GROUP	4
CRITERION 2: OPERATIONS AND SUPPLY CHAIN	5
CRITERION 3: RISKS OF MODERN SLAVERY	8
CRITERION 4: ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS	10
CRITERION 5: TRACKING EFFECTIVENESS	20
CRITERION 6: CONSULTATION WITH ENTITIES OWNED OR CONTROLLED	21
CRITERION 7: OTHER RELEVANT INFORMATION	22

CRITERION 1: REPORTING ENTITY

THE STAR ENTERTAINMENT GROUP

The Star Entertainment Group Limited is an ASX-listed company that owns and operates The Star Sydney, The Star Gold Coast and Treasury Hotel Brisbane. In addition, The Star is appointed by Destination Brisbane Consortium (DBC) to operate The Star Brisbane, which commenced operations in August 2024. The Star holds an equity interest in DBC and Destination Gold Coast Consortium. The Star also manages the Gold Coast Convention and Exhibition Centre on behalf of the Queensland Government.

The Star's purpose is to create fun at trusted destinations. The Star welcomes millions of guests each year across its three properties in Sydney, the Gold Coast, and Brisbane (each a 'Property' and collectively, the 'Properties') and delivers unique, memorable experiences. We employ over 8,000 team members, support downstream employment, and are proud to support the communities in which we operate.

As one of Australia's major hospitality and entertainment providers, The Star strives to protect and support the rights and freedoms of our customers, employees and those engaged within our supply chain. The Star's FY2025 Modern Slavery Statement will be The Star's sixth published Statement and responds to the reporting criteria outlined in the Act.

CRITERION 2: OPERATIONS AND SUPPLY CHAIN

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

- Casino and gaming
- Food and beverage outlets
- Theatre and entertainment
- Retail outlets
- Conference facilities
- Spa and hotel services
- Accommodation
- Car parking

Supply Chain

The Star buys goods and services from a diverse supplier base across a range of categories, including hard services, soft services, food and beverage, construction and equipment, IT, corporate and professional services, transport, and travel. We expect and require our suppliers to understand the commitments and accept the conditions set out in our Supplier Code of Conduct through a robust tender process and internal audits.

In FY25, The Star purchased products and services from approximately 1,715 suppliers, totalling \$571 million in spend¹. Supplier spend includes both capital and operational expenditure and does not include payments passed through Accounts Payable that do not relate to the provision of goods and services.

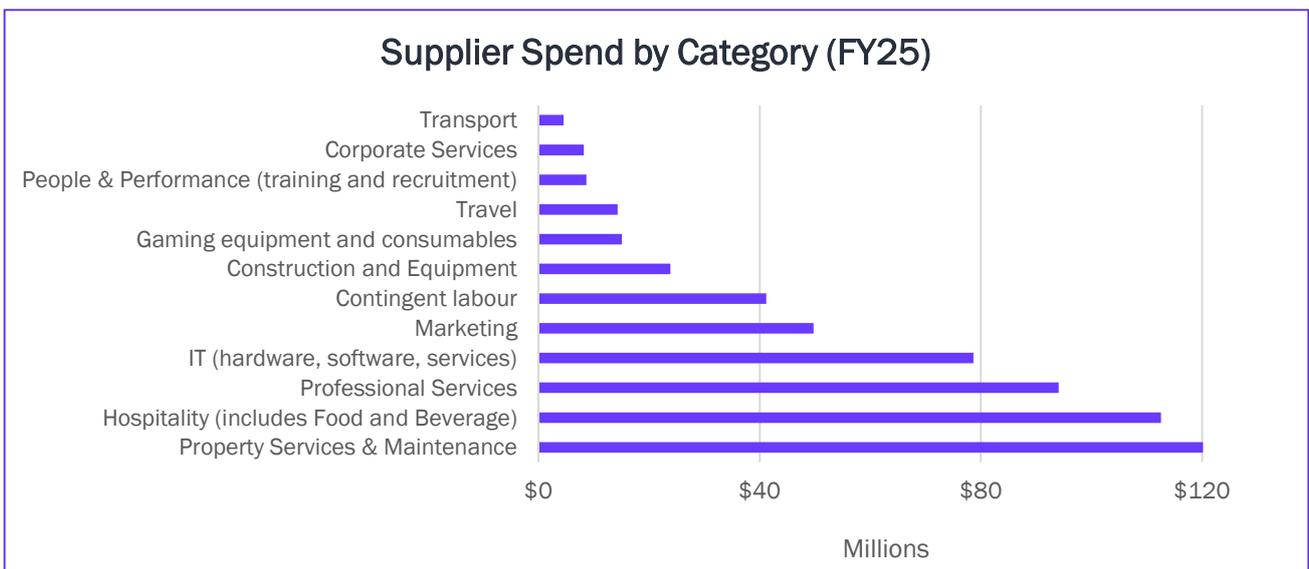


Figure 1. Data shows the breakdown of spending by supplier category.

¹ The Star notes a correction to the FY24 Statement: the supplier count has been updated from 916 to 1,663. This reflects improved data accuracy and does not affect actions taken to address modern slavery risks.

Consistent with FY24, in FY25, 97% of total spend was with direct suppliers located in Australia. All other countries combined accounted for less than 3% of the total spend.

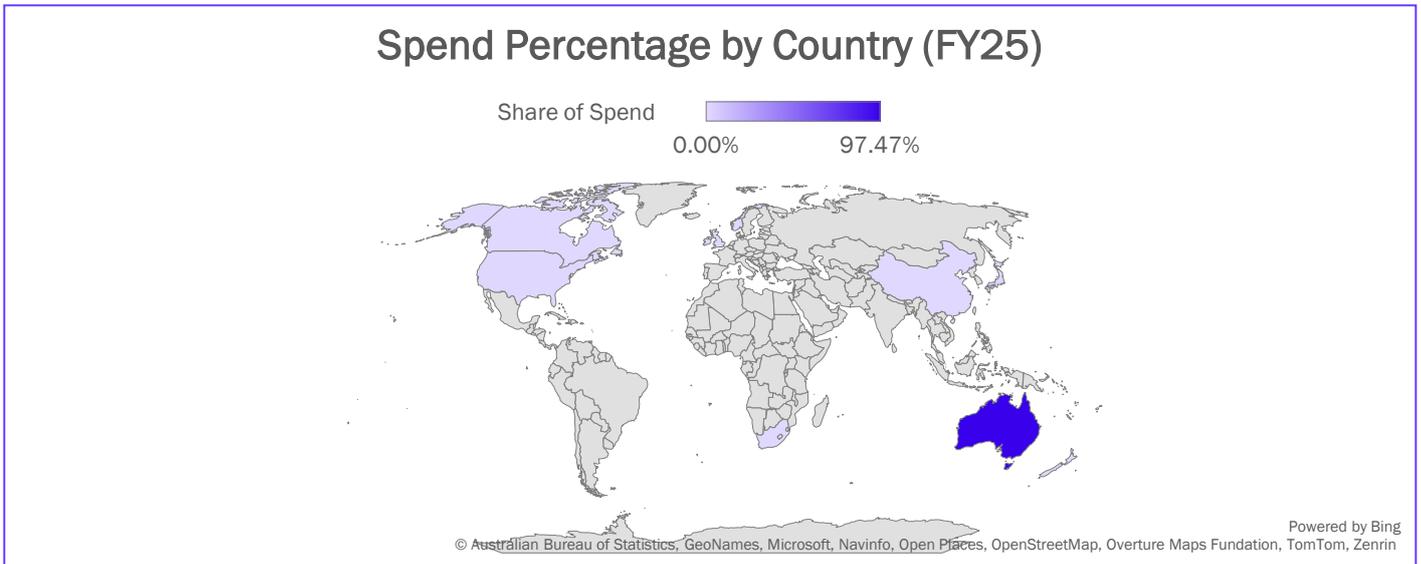


Figure 2. Data shows the breakdown of spending as a percentage by country

Country	Share of Spend
Australia	97.466%
Japan	1.006%
Netherlands	0.547%
USA	0.424%
China	0.128%
Canada	0.123%
UK	0.087%
Ireland	0.076%
Jersey	0.043%
South Africa	0.010%
Norway	0.008%
New Zealand	0.004%
Israel	0.001%
N/A	0.077%

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

Workforce Composition

The Star employs over 8,000 team members across three major properties in Sydney, Gold Coast, and Brisbane. Our workforce spans a diverse range of industrial employment instruments and contract types, including enterprise agreements, awards, and individual contracts. This diversity reflects the complexity of our operations and the need for specialised skills across gaming, hospitality, entertainment, and corporate services.

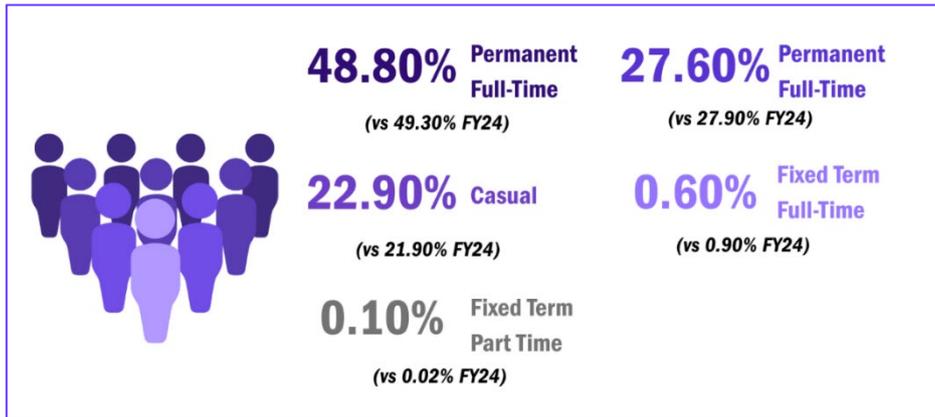


Figure 3. As of 30 June 2025, The Star employed a total of 8,487 people, with the breakdown of employment contracts provided above.

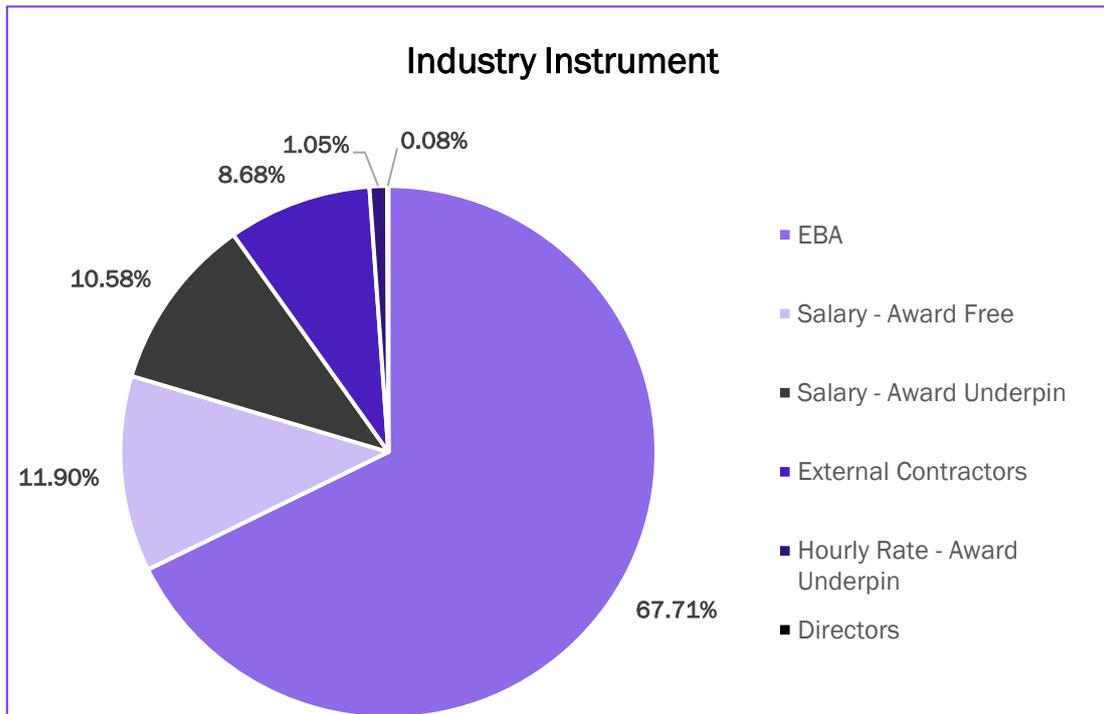


Figure 4. Industry Instrument showing the percentage breakdown of employment contracts and contingent worker details

CRITERION 3: RISKS OF MODERN SLAVERY

In FY25, The Star was a participant of the UN Global Compact and strived to align its practices with the United Nations' Guiding Principles on Business and Human Rights (UNGPs) and the United Nations "Protect, Respect and Remedy" Framework when shaping our approach to identifying and addressing modern slavery risks across our operations and supply chain. Through consultation with suppliers and key stakeholders, we seek to understand how our activities may cause, contribute to, or be directly linked to adverse human rights impacts, enabling us to take action to cease, prevent, and remedy these impacts.

Modern slavery risks in our operations

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

Direct Employees

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

Indirect employees - Contractors / contingent workers

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

Customers

- Risks associated with modern slavery may be due to money laundering proceeds from organised crime, which may include human trafficking and modern slavery/exploitation.
- Human trafficking risks associated with hotels/casinos.
- Risk mitigation: AML/CTF program and probity checks. Advanced security, surveillance, and investigations, including collaboration with law enforcement. Training for relevant team members with a particular focus on the parts of the business likely impacted (e.g., casino, hotels, food and beverage).

Modern slavery risks in our supply chain

In FY22, The Star conducted an analysis of 99% of its direct suppliers to identify inherent modern slavery risks based on factors such as industry, geography, and other relevant indicators. This review found that most suppliers presented a low-to-medium level of inherent risk.

Building on this analysis and incorporating insights from the 2021 Global Estimates of Modern Slavery, The Star developed a modern slavery risk matrix in FY23. This matrix provides a deeper understanding of potential risks within the broader supply chain, including the nature of those risks and the types of modern slavery that may occur.

The matrix is used by our Procurement and Sustainability teams to inform policies and processes, and to engage with suppliers both prior to and during their relationship with The Star. This approach helps us better identify and address potential risks.

Modern Slavery Supply Chain Risk Matrix

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

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

Governance

The Star believes that preventing modern slavery is a shared accountability within the Group. Each person plays a vital role in identifying risks, implementing controls, and fostering a culture of transparency and accountability.

Strong governance is foundational for the effective management of modern slavery-related risks. In FY25, the governance of modern slavery risks was managed predominantly by Group functions and practices.

- The Star Entertainment Group Limited Board has ultimate oversight of the program, risks and regulatory obligations. The TSEG Board provides strategic direction, reviews and approves policies and the annual Modern Slavery Statements to support transparency and accountability in addressing modern slavery risks across our operations and supply chains.
- The Modern Slavery Working Group Executive Sponsor, the Group Chief Operating Officer, supports the working group, champions the modern slavery program and is an escalation point.
- The Modern Slavery Working Group plays a key role in delivering on the commitments outlined in annual Modern Slavery Statements and driving continuous improvement. Guided by senior leaders, the Working Group brings together expertise from the Procurement, Sustainability, People and Culture, Investigations, and Financial Crime teams.
- Modern slavery risks are also captured within our Risk Management Framework (RMF) and Risk Appetite Statement (RAS). The Group Board Risk and Compliance Committee oversees our RMF and monitors performance against the Group's RAS.



Figure 6. Governance Structure Overview

In FY25, The Star commenced transition to a decentralised operating model with the intention of promoting greater accountability at properties for business performance, risk and compliance. The model, when fully implemented, will create clear lines of ownership, decision-making, and governance, while maintaining alignment with Group strategy.

As part of this transition, in FY25, a Governance Framework was developed, which allocates oversight and corporate governance responsibilities across the Group’s companies. In particular, this Governance Framework has established a board for each of the subsidiary companies that operate an integrated resort, specifically in Sydney, Gold Coast and Brisbane (Property Boards).

In line with the intentions of this governance uplift and as embedment of the Governance Framework occurs throughout 2026, accountabilities for the management of modern slavery risks within The Star’s properties will be allocated to the respective Property Boards and Property Risk and Compliance Management Committees, which will continue to enhance our management of modern slavery risks.

The Star's modern slavery program is based on the Guidance for Reporting Entities provided by the Australian Government and adopts a human rights due diligence framework, with the following priorities:

Policy Commitment

The Star has committed to respecting human rights and addressing the risk of modern slavery in its operations and supply chains, as noted in our Annual Report and annual Modern Slavery Statement.

This commitment is supported by a framework of governing policies and strategies. Policies are available on the company intranet and company website, and are reinforced through stakeholder engagement, education, and awareness training.

Risk Framework

Modern slavery risks are included within our Risk Management Framework and Risk Appetite Statement. We recognise the critical importance of identifying, assessing, and mitigating modern slavery and human rights risks to uphold our ethical standards and legal obligations. By embedding modern slavery considerations into our risk management processes, we aim for potential and actual human rights impacts to be systematically evaluated and addressed. Our Risk Appetite Statement supports us to monitor and minimise modern slavery risks through our supplier base.

Responsible Procurement Policy

The Star has a Responsible Procurement Policy. This Policy aims to further integrate ethical, responsible, and sustainable practices into our sourcing of goods and services. It strictly prohibits labour exploitation and modern slavery practices, including human trafficking, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruitment, and child labour. The policy applies to all sourcing decisions across the Group.

Supplier Code of Conduct

The Star takes a long-term view towards responsible and sustainable procurement. Our Supplier Code of Conduct explicitly outlines expectations and requirements in the following key areas. Compliance with this Code is mandatory for all suppliers as part of the contracting process. When a supplier signs a contract or receives a purchase order, they agree to comply with this Code.

Key Areas:

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

Supplier Risk Management

Tenders for major supplier partnerships include questions to assess the risk of modern slavery. Responses are assessed by the Procurement and Sustainability team with support from the Modern Slavery Working Group, with scores forming part of the overall consideration and decision-making process.

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

Category-specific supplier management

To address inherent category risks for cleaning and housekeeping, the Modern Slavery Working Group has a strategic action plan for the soft services category, which includes the following initiatives:

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

Supplier contracts

A modern slavery clause is included within The Star’s standard purchase order and supplier agreement/s, which require suppliers to:

- Comply with all obligations indirectly or directly connected to its supply chain, including (without limitation) applicable modern slavery laws.
- Upon request, complete and submit documentation with respect to the supplier’s compliance with modern slavery laws and perform any rectification action required by The Star arising from the submitted documentation.

Further, in The Star’s standard supplier agreement/s, an audit clause states that each of the supplier’s obligations under the modern slavery clause is an auditable obligation, and at any time during the term of the agreement, The Star may, at its expense, audit the supplier’s compliance.

Policies Supporting Team Members

Our governance and policy framework is designed to ensure that all team members, whether employed directly or indirectly, work in an environment that upholds their rights, including freedom of association, health and safety, diversity, equity and inclusion, and freedom from bullying, harassment, or discrimination.

Policies supporting these commitments are accessible to team members via our internal intranet and include:

Policy	Purpose and implementation
Procurement Policy	Requires suppliers to comply with labour laws, anti-corruption standards, and ethical business practices. Suppliers must ensure their own supply chains are free from forced labour and human trafficking, aligning with The Star's commitment to sustainability and integrity.
Code of Conduct	Available in four languages, the Code of Conduct sets clear expectations for ethical behaviour, compliance with laws, and integrity in all dealings. It emphasises speaking up about wrongdoing, including unlawful activity or exploitation, and guarantees protection for those reporting breaches. This framework helps prevent modern slavery by promoting transparency and accountability across operations.
Grievance Policy	Provides a formal process for employees and stakeholders to raise concerns about unethical practices, including modern slavery. Ensures accessibility, confidentiality, and remediation pathways.
Whistleblowing Protection Policy & Independent Whistleblowing Hotline	Allows employees and third parties to report suspected unethical conduct anonymously and without fear of retaliation. Includes an independent hotline and legal protection for whistleblowers.
Diversity and Inclusion Policy	Promotes equal opportunity and respect for all individuals, reducing vulnerability to exploitation. It promotes equal opportunity, cultural awareness, and respect, aligning with human rights principles and supporting compliance with modern slavery legislation.
Health and Safety Policy	Supports safe working conditions and prevents exploitation in unsafe environments. Includes monitoring and compliance measures to uphold worker dignity and rights.
Equal Employment Opportunity	Supports fair treatment in recruitment and employment practices, preventing coercion or discrimination that can lead to potential modern slavery risks.
Discrimination and Harassment Policy	Prohibits abusive or coercive behaviour to foster a safe and respectful workplace. Helps prevent conditions that enable forced labour or exploitation.

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

Diversity, Equity, and Inclusion

Our Commitment to Diversity, Inclusion, and Human Rights

The Star recognises that fostering diversity, equity, and inclusion is integral to respecting human rights and the role it can play in reducing vulnerabilities that can lead to modern slavery. Our approach reflects our values of mutual understanding, support, and collaboration, ensuring that all voices are heard and valued. This commitment is demonstrated through industry-leading achievements:

- **Gender Equality:**
We report annually to the Workplace Gender Equality Agency (WGEA) and were awarded the Employer of Choice for Gender Equality citation from 2021 to 2023, highlighting our dedication to gender equity, flexible working conditions, and gender pay equity.
- **LGBTQ+ Inclusion:**
At the 2025 Australian LGBTQ+ Inclusion Awards, The Star was recognised as Joint Employer of the Year for the second consecutive year and awarded AWEI Platinum Employer Status. This recognition reflects our ongoing efforts to create safe, respectful, and inclusive environments across all properties.

Due Diligence

Assessing risks

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

In FY24, The Star's Modern Slavery Risk Matrix was used to establish a risk profile for each supplier category. In categories where risks are identified, the Procurement Team initiates actions such as engaging the Sustainability Team or the Modern Slavery Working Group, increasing the number of questions and rating criteria during the tender process, or implementing other interventions.

In FY25, The Star undertook an exercise to reassess the modern slavery risks in labour hire supply contracts. As part of this process, the Procurement Team engaged the market to evaluate supplier suitability, competitiveness, and commitment to preventing modern slavery.

Eight suppliers providing agency staff were shortlisted for evaluation, and our Employee Relations Team conducted reviews of each supplier's labour practices. This included checking redacted employee records such as pay slips, work rights, and employment conditions to confirm that agency staff were performing correctly paid work meeting National Minimum Wage requirements and not subjected to debt bondage, forced labour or deceptive recruiting conditions.

Suppliers were also required to provide documentation demonstrating policies and processes to identify, investigate, and address modern slavery risks within their organisations. Evidence requested included grievance mechanisms (including anonymous reporting), fatigue management, ethical conduct standards, induction and onboarding practices, and their own Modern Slavery Statement or commitments. Additionally, suppliers were required to show that they maintain appropriate policies

for employing overseas workers, provide education on workplace rights, uphold conditions of employment (covering wages, leave, tax, superannuation, and pay slip provision), maintain accurate records, respect workers' rights to join a union, and implement measures ensuring safe working conditions.

As a result of this reassessment, The Star confirmed that all shortlisted suppliers met the required standards under the Supplier Code of Conduct and ethical labour practices. The reviews identified no evidence of modern slavery indicators such as debt bondage, forced labour, or deceptive recruitment.

Inherent risk assessment

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

Modern slavery risks were mapped against the Global Estimates of Modern Slavery and other data sources to highlight inherent geographic, industry, or product risks.

- **Country risk analysis:**
 - Risk ratings assigned to each country through an assessment of human rights databases, indices and reports from internationally recognised bodies, including the Global Rights Index, International Labour Organisation, and World Bank.
- **Industry risk analysis:**
 - Industry assessment of the likelihood and impact of known modern slavery risk factors, including labour intensity, use of migrant labour and presence of opaque intermediaries.
- **Industry controversy assessment:**
 - Media and literature assessment to determine whether any controversies relating to each of the modern slavery risks has occurred in the last 10 years.
- **Calculation of inherent risk score:**
 - An inherent risk score was created for each supplier that considers these factors to achieve an overall inherent risk per industry/country combination.

Results from the FY23 data analysis indicated that most suppliers had a low-medium inherent risk rating. This data analysis supports awareness and supplier engagement with higher-risk suppliers.

Self-assessment questionnaires (SAQ)

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

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

Ten suppliers in these categories, each of whom The Star spent over \$100,000 in FY24, were asked to complete an SAQ. The Procurement Team oversees SAQs, with category managers responsible for distributing, scoring and engaging with suppliers based on their risk profiles. The results from the 2024 SAQ conducted maintained relevance in FY25 and continued to inform our approach.

Assessing involvement in potential or actual adverse impacts

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

According to the UN Guiding Principles on Business and Human Rights (UNGPs), there are three ways in which an enterprise can be involved in an adverse human and labour rights impact:

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

Responding to potential or actual adverse impacts

The Star uses guidance from the UNGPs when determining how to respond to potential or actual adverse impacts. Responses are tailored on a case-by-case basis, based on the nature of our involvement, to ensure that each supplier remains aligned with their contractual modern slavery obligations. This approach enables us to apply appropriate remedies, leverage influence, and uphold our commitment to ethical and responsible business practices across our supply chain.

Incident management

Grievances, incidents, or potential adverse impacts can be raised by team members, suppliers, or their employees through whistleblowing, breach reporting, or employee relations channels. These matters are managed through established processes involving breach or whistleblowing procedures, investigations, and support from People and Culture or Legal Teams.

Where issues relate to potential modern slavery or labour exploitation, the Modern Slavery Working Group and relevant business managers are engaged to ensure appropriate oversight and action. This collaborative approach reinforces our commitment to transparency, accountability, and the protection of human rights across our operations and supply chain.

Integrating findings and taking action

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

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

Communicating and reporting

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

In Monash University’s latest research project, [Modern Slavery Disclosure Quality Ratings: ASX100 Companies Update](#), The Star’s FY24 Modern Slavery Statement received an ‘A’ rating. This achievement reflects a consistent upward trajectory in our disclosure quality and underscores our commitment to transparency.

Reporting period	Rating
FY20	E
FY21	C
FY22	B
FY23	A
FY24	A

Figure 7. Table outlining The Star’s rating from the Monash University’s Modern Slavery Disclosure Quality Ratings: ASX100 Companies Update

Stakeholder engagement

We are committed to protecting the rights of all stakeholders impacted by modern slavery risks or incidents. Our People and Culture Team, together with our Investigations Team, play a critical role in this process. Through training, open communication channels and timely support, we address concerns promptly and transparently, ensuring fairness at every stage. This collaborative approach reflects our commitment to human rights and ethical standards across our operations and supply chains.

Training and Education

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

Online education regarding The Star's modern slavery program was introduced in 2021 and over 5,000 employees completed the voluntary training program. In 2023, the voluntary training program was replaced by new modern slavery training, making the learning module mandatory for our Legal, Procurement, and Sustainability teams.

The modern slavery learning module includes the following:

- Information about who may be affected by modern slavery, how it impacts people, the statistics that are available and the forms of slavery that exist
- The risk of modern slavery as it relates to geography, industry, products, or services
- Our responsibilities of ensuring we do not cause, contribute, or be directly linked to modern slavery within our operations or supply chain, including examples and case studies
- Information relating to modern slavery in Australia, and characteristics of a business or supplier relationship that may indicate risks of modern slavery
- Supply chain transparency, and how it relates to the responsibilities of various departments within the business
- Modern slavery legislation around the world, and in Australia
- The Star's ethical sourcing policy and commitments to ethical supply chain management.

Supplier Engagement

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

Working with Unions and freedom of association

The Star is committed to supporting our team members' rights to choose to join a union or employer association and to participate in industrial activities. We believe in

the principles of freedom of association and collective bargaining, recognising them as essential to fostering a fair and just workplace.

We actively engage with relevant unions throughout the enterprise bargaining process, working collaboratively to negotiate fair terms and conditions for our team members.

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

Whistleblowing and access to grievance mechanisms

The Star’s Raise It campaign, Whistleblower Protection Policy, and associated independent whistleblower service empower team members, suppliers, and their employees to report concerns anonymously and in multiple languages via a confidential online platform or an external 1800 number.

The Raise It campaign is regularly promoted across all properties through internal communication channels and the company intranet.

Our Supplier Code of Conduct, available on The Star’s corporate website, outlines details of our independent whistleblowing and integrity service, providing a mechanism for any workers to raise concerns about working conditions.

In addition, suppliers are expected to maintain their own grievance mechanisms and support employees in making anonymous reports. Compliance with this requirement is assessed during the request for tender or proposal process for key suppliers.

Reporting Channel	How to use the Reporting Channel
	<p>Call the secure external hotline – Your Call.</p> <p>You can make a report via telephone to the external Whistleblowing Hotline service operated by Your Call:</p> <p>1800 319 826 (7:00am to midnight AEST on business days).</p> <p>You may elect to remain anonymous or choose to share your contact details with The Star.</p>
	<p>Report securely online – Rely platform.</p> <p>You can make a report to our online reporting portal at any time via:</p> <p>star.relyplatform.com/report</p> <p>You may elect to remain anonymous or choose to share your contact details with The Star.</p>
	<p>Report to an internal Eligible Recipient.</p> <p>You have the option to report to the following individuals authorised by The Star under the Corporations Act to receive reports:</p> <ol style="list-style-type: none"> Whistleblower Protection Officer. Any Director, Secretary, the Group Chief Executive Officer, a member of the Group Leadership Team, a “General Manager” or another senior manager of The Star. An actuary, auditor or member of an audit team conducting an audit of The Star.

Figure 8. Outlines the available reporting channels and provides guidance on how to use them.

CRITERION 5: TRACKING EFFECTIVENESS

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

Modern Slavery Training Conducted

During the reporting period, 35 employees from corporate departments with higher exposure to modern slavery risks such as the Procurement, Legal, and Sustainability teams completed modern slavery training, achieving a 94% completion rate.

Supplier engagement

Awareness of modern slavery and labour exploitation is a key focus, with these topics embedded as recurring discussion points in supplier engagement and regularly included on meeting agendas alongside sustainability

CRITERION 6: CONSULTATION WITH ENTITIES OWNED OR CONTROLLED

The Star Entertainment Group Limited, The Star Entertainment Sydney Holdings Limited, The Star Pty Limited, The Star Entertainment QLD Limited, The Star Entertainment Brisbane Holdings Pty Ltd, The Star Entertainment Brisbane Operations Pty Ltd, and The Star Entertainment Finance Limited, and each of the entities owned or controlled by the Group, as detailed in The Star's most recent Annual Report, operate under the governance of The Star Entertainment Group Limited Board and in accordance with The Star's policies. For The Star, this means that each of the reporting entities are required to comply with, manage and engage in the same processes, policies and protocols in their day-to-day business operations, including regular consultation with the relevant business leads responsible for such processes and protocols. Representatives from each of the reporting entities consulted with representatives of the entities that the reporting entities own or control in the collation of this Statement and each have reviewed and contributed to the Statement. Representatives of The Star Entertainment Group Limited, as the entity giving this Statement, also consulted with representatives of the other reporting entities.

The Star's most recent Annual Report can be found at:
starentertainmentgroup.com.au/annual-reports

CRITERION 7: OTHER RELEVANT INFORMATION

The Star is committed to developing and implementing programs that build capability over time. Our goal is to make a meaningful contribution to addressing the complex and far-reaching issue of modern slavery. Through improvement of our initiatives and strategies, we aim to strengthen our effectiveness and create lasting change. This commitment reflects our broader dedication to social responsibility and ethical business practices.

Key milestones include:

2020	<ul style="list-style-type: none"> • Ethical Sourcing Policy approved by The Star Entertainment Group Limited Board.
2021	<ul style="list-style-type: none"> • Modern Slavery Working Group established. • Online Modern Slavery training introduced. • Clauses related to modern slavery and the right to audit included in all supplier contracts and purchase orders. • Questions relating to modern slavery risks included in the tender process for key suppliers. • 78% of direct suppliers analysed for modern slavery risks. • Self-assessment questionnaires conducted with higher risk suppliers
2022	<ul style="list-style-type: none"> • 99% of direct suppliers analysed for modern slavery risks. • Modern Slavery training updated. • New independent whistleblowing hotline and reporting platform introduced. • Membership of Cleaning Accountability Framework (CAF). • Self-assessment questionnaires conducted with higher risk suppliers.
2023	<ul style="list-style-type: none"> • Modern Slavery Risk Matrix created. • Audits on select cleaning companies undertaken. • Strategic Action Plan created for soft services (cleaning/housekeeping), with tender process reviewed and updated. • Self-assessment questionnaires conducted with higher risk suppliers.
2024	<ul style="list-style-type: none"> • Category specific team member and supplier engagement, training, and education completed including sessions for Investigations, Talent Acquisition, Housekeeping, Security and Surveillance teams (SYD and QLD). • Supplier engagement sessions with 4 key suppliers held to discuss modern slavery, social responsibility, and sustainability. • Created “Responsible Procurement Policy” to combine and uplift. “Ethical Sourcing Policy” and “Procurement Policy”. • Updated “Supplier Code of Conduct” to provide additional details around modern slavery and human rights. • A Modern Slavery Resources section was created in the supplier section of our corporate website, utilising resources from UNGCNA and Attorney-General’s

	<p>Department.</p> <ul style="list-style-type: none"> • A focused intent to rationalise the supplier base, with fewer suppliers, better relationships, and greater visibility to safeguard our guests, staff and partners. • Improved systems and controls to manage contracts through new procurement system 'Gatekeeper'. • Self-assessment questionnaires conducted with higher-risk suppliers.
2025	<ul style="list-style-type: none"> • Continued to review and improve selection, onboarding and contracting suppliers to understand and manage risks, including contract clauses. • Continued to raise awareness of modern slavery among team members and selected suppliers. • Targeted awareness sessions were held to build awareness of unconscious bias and modern slavery risks. The training covered spotting red flags, practical scenarios, and accountability through team coaching. • These intentions will continue to be areas of focus within FY26.
2026	<p>Within FY26, we will look to:</p> <ul style="list-style-type: none"> • Enhance embedment of modern slavery risk management within the Properties and the property governance bodies. • Consider any impact of The Star's cultural reform program on modern slavery risk management, including opportunities to enhance a 'speak up' approach. • Consider opportunities to enhance education and engagement to raise awareness of modern slavery risk management among team members and suppliers. • Complete a review of our Modern Slavery Risk Matrix .

This Statement was approved by the Board of The Star Entertainment Group Limited.

Signed,



Bruce Mathieson Jnr
 Group Chief Executive Officer & Managing Director
 The Star Entertainment Group Limited



Registered Office

Level 3, 159 William Street, Brisbane QLD 4000

Property Locations

The Star Sydney: 80 Pyrmont Street, Pyrmont New South Wales 2009

The Star Gold Coast: 8 Casino Drive, Broadbeach Queensland 4218

The Star Brisbane: 33 William Street, Brisbane Queensland 4001

Treasury Brisbane: 130 William Street, Brisbane Queensland 4000

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

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

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