



Modern Slavery Statement 2025



Bringing joy to life through the power of play



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Reporting Entities

Aristocrat Australian Reporting Entities:

1. Aristocrat Leisure Limited (ACN 002 818 368)
2. Aristocrat International Pty Ltd (ACN 000 148 158)
3. Aristocrat Technologies Australia Pty Limited (ACN 001 660 715)
4. Aristocrat Global Holdings Pty Ltd (ACN 605 116 783)
5. Aristocrat Technology Gaming Systems Pty Limited (ACN 086 153 086)
6. Aristocrat Technical Services Pty Limited (ACN 002 645 070)

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

Reporting Year: 6

Reporting Period: 1 October 2024 – 30 September 2025 (**FY25**)

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 (**ALL**) 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: 5

Reporting Period: FY25

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: 9

Reporting Period: FY25

Type of statement: mandatory statement

For the purposes of the UK Modern Slavery Act, this Modern Slavery Statement is provided by Aristocrat Technologies Europe Limited (**ATEL**). In previous years, ATEL did not meet the threshold for reporting and submitting a statement as required under section 54 of that Act and provided statements on a voluntary basis to document ATEL's year-on-year progress. For FY25, ATEL is providing a mandatory statement.

Aristocrat Canadian Reporting Entities:

1. Aristocrat Technologies Canada, Inc

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

Reporting Year: 3

Reporting Period: FY25

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 and covers all seven mandatory criteria for reporting as set out in Part 2 section 11(3) of the Canadian Modern Slavery Act.

Note: In this Statement, we use the term 'anti-modern slavery' where possible, to make clear that Aristocrat seeks to stamp out these practices, and not simply report on them.

As a global business, 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. We also recognise the importance of implementing a modern slavery response that reflects the lived experience and expertise of survivors and advocates, and we aim to create opportunities for those with lived experience and expertise to inform our response.

Information provided in this Statement is provided for the reporting period 1 October 2024 – 30 September 2025 and is current as at 30 September 2025 unless otherwise indicated.





Foreword from The Chairman and CEO

At Aristocrat our core value of ‘Good Business, Good Citizen’ guides our global enterprise in everything we do, including the work we do through our Anti-Modern Slavery Program. Aristocrat is opposed to all forms of modern slavery. We acknowledge that modern slavery and human trafficking are complex global challenges 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 annual statement outlines the progress we have made and highlights the key actions we took during our 2025 financial year (FY25) to improve our Anti-Modern Slavery Program. This is the sixth annual Modern Slavery Statement we are publishing under the Australian Modern Slavery Act, and our third Statement published under new Canadian legislation. Since 2017, we have also reported under the UK Modern Slavery Act, and are increasingly taking a coordinated and enterprise-wide approach to this crucial issue.

Aristocrat’s Anti-Modern Slavery Program is designed to identify and address the many forms of modern slavery that exist and facilitate appropriate action through a robust due diligence process and risk management framework. This program supports our ambition to maintain sustainable business operations, conducted ethically and in line with applicable laws, in which all workers throughout our operations and supply chains are treated with respect and dignity.

This Statement sets out progress delivered against the commitments we made in FY25, while also outlining key additional measures implemented during the reporting period.

In FY25, we continued to advance our modern slavery risk management framework in line with regulatory requirements. Our efforts focused on strengthening governance and deepening our understanding of potential modern slavery risks across the broader supply chain. Through a structured program of supplier audits, we observed positive engagement and transparency. These assessments revealed varying levels of maturity in suppliers’ modern slavery programs, highlighting both well-established practices and areas requiring further development. This further underscores the complexity of supply chain risk and the need for continuous improvement. Consistent with regulatory guidance, our approach includes ongoing risk assessment and due diligence, strong supplier engagement to strengthen policies and training, and a commitment to continuous improvement through capacity-building initiatives. We are committed to working closely with suppliers to enhance their capabilities and ensure alignment with our ethical standards and legal obligations, including expanding audit coverage and refining risk assessment methodologies.

During the reporting period, we maintained efforts to increase employee awareness and engagement across our global operations and delivered role-specific training to supplier-facing employees. This is consistent with Aristocrat’s belief that combating modern slavery in our operations and supply chain is the responsibility of all employees, and that everyone has a role to play.

In FY26, we remain focused on strengthening our responsible sourcing practices. We anticipate focusing on areas such as expanding audit coverage in higher-risk geographies and categories, enhancing our risk assessment methodology with improved insights, and exploring opportunities for targeted training and capacity-building for suppliers. We also aim to review and refine our remediation processes and consider ways to develop meaningful indicators that help us monitor progress and effectiveness across our supply chain. These efforts reflect our ongoing commitment to continuous improvement and collaboration with our partners.

During this reporting period, there have been significant regulatory developments aimed at strengthening modern slavery frameworks globally. These developments reflect an increasing regulatory focus on mandatory reporting criteria, due diligence obligations, and accountability measures for entities operating across complex supply chains.

We recognise the importance of these changes and are actively considering their implications as we continue to evolve our approach to modern slavery risk management. We continue to closely monitor legislative and policy developments across all jurisdictions in which we operate, assess potential impacts on our governance and reporting processes, and evaluate our approach against emerging best practices and regulatory expectations. This proactive stance is aimed at maintaining a framework that is robust, responsive, and consistent with global standards for ethical business conduct.

We acknowledge and thank our dedicated Anti-Modern Slavery Working Group, and everyone working across Aristocrat’s global enterprise who have contributed to our progress in FY25, 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.

“ During the reporting period, we maintained efforts to increase employee awareness and engagement across our global operations and delivered role-specific training to supplier-facing employees. ”



Neil Chatfield
Chairman



Trevor Croker
Chief Executive Officer & Managing Director



I. Who we are: Our structure and business

A. Our structure

Aristocrat Leisure Limited (**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).

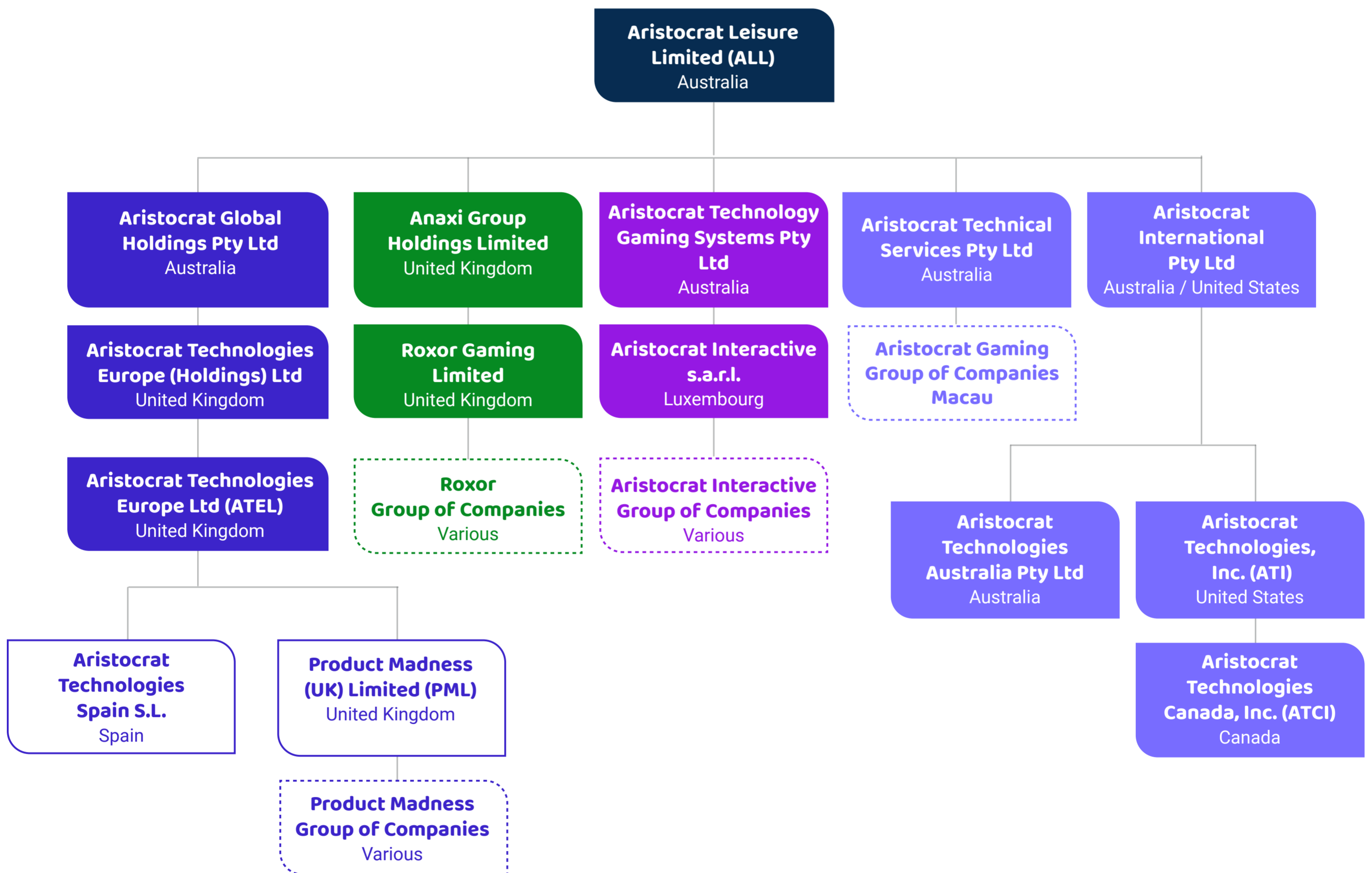
Each Aristocrat Australian Reporting Entity (other than ALL):

- 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.

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 are required to comply with relevant policies and procedures in this space. 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 does not represent all Aristocrat entities. For the above, entities are listed along with their country of incorporation.

Note 2: ATEL is also registered and operating branches in Cyprus and Austria under its own name.

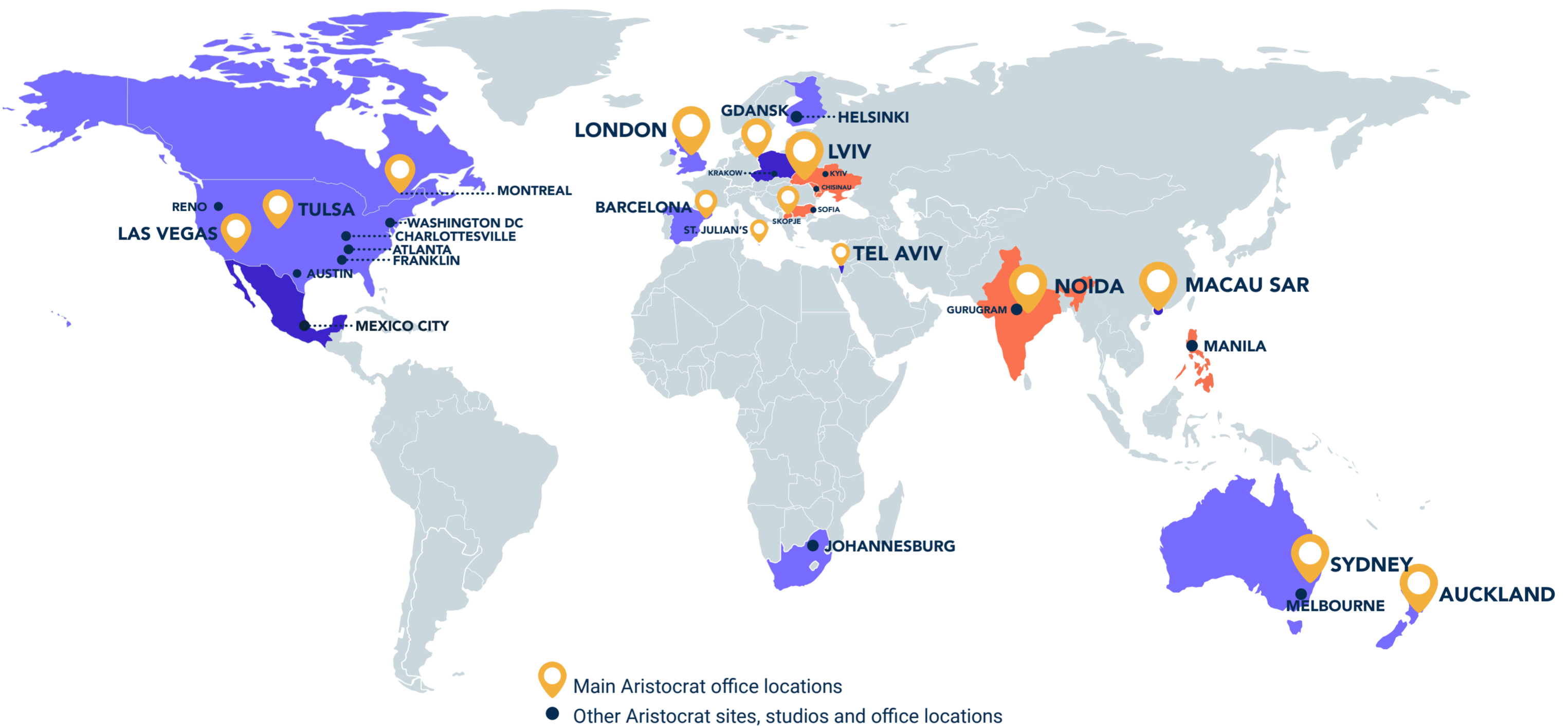


B. Our business

ALL is a global entertainment and gaming content creation company powered by technology. Aristocrat offers a diverse range of products and services including electronic gaming machines (EGMs), casino management systems, and online real money games, including iLottery, as well as free-to-play social casino games, that serve customers and entertain millions of players worldwide every day. Our three reporting segments comprise regulated land-based gaming (Aristocrat Gaming), social casino (Product Madness) and regulated online real money gaming (Aristocrat Interactive). Aristocrat's team of around 7,400+ people across the globe is united by our company mission to **bring joy to life through the power of play**. Aristocrat aims to create long-term sustainable value

for stakeholders, including by leading our industries in responsible gameplay and governance standards.

The Group has offices and employees located around the world. ALL's registered office is in North Ryde, Sydney, Australia.



Level of risk

Country or Territory and Group

Lower

Australia
 Canada
 Finland
 Malta

New Zealand
 South Africa
 Spain
 United Kingdom*
 United States

Medium

Israel
 Macau SAR
 Mexico
 Poland

High

Bulgaria
 India
 Moldova
 North Macedonia
 Philippines
 Ukraine

* Note: This also includes British Overseas Territories

7,400+

people

25+

locations

Aristocrat's Geographic Risk Categorisation

Countries ranked 1 to 60 on Walk Free's Global Slavery Index 2023 are treated as higher risk, countries ranked 61 to 120 are treated as medium risk, and countries ranked 121 to 180 are treated as lower risk.

The map above represents Aristocrat's main office, studio and site locations in FY25. Aristocrat ceased to have a presence in some of these locations during FY25 and other locations may have been closed after the reporting period.



B. Our business

Following a strategic review of Aristocrat’s Pixel United business, Aristocrat completed the divestiture of Plarium in February 2025 and post year-end, we entered into agreements to divest Big Fish Games in line with our strategy. From financial year 2026 onwards, Aristocrat’s mobile operations will be focused purely on social casino (Product Madness).

The foundation of Aristocrat’s strategy remains a commitment to investment and innovation to create the world’s leading gaming content at scale. Aristocrat now encompasses three focused and fully complementary business segments:



Aristocrat Gaming is the leading designer, manufacturer and distributor of regulated land-based EGMs across the globe. From award-winning games and hardware to unique game mechanics and leading performance, Aristocrat Gaming is licensed to operate in more than 330 jurisdictions across the globe. We strive to be an industry leader in responsible gameplay, as part of ensuring a vibrant and sustainable industry.

The Group integrates (assembles) EGMs and gaming systems in Australia, the USA, and Spain via local entities in the Group, including Aristocrat Technologies Spain S.L. in Spain, Aristocrat Technologies, Inc. in the USA, and the Aristocrat Australian Reporting Entities in Australia.

Aristocrat Gaming sells, and in some jurisdictions also leases, new EGMs and games directly to end customers across the Americas (including Canada and Latin America (**LATAM**)), Europe, Middle East and Africa (**EMEA**), Asia Pacific (**APAC**), Australia and New Zealand. In North America (including Canada), APAC, LATAM, and EMEA, the business also derives recurring revenue through its gaming operations. Further, Aristocrat Gaming has distribution arrangements in the Americas (including North America and LATAM), EMEA and APAC, through which our EGMs and games are offered via distributors who then market and sell and/or lease our EGMs and games to customers in each location.



Product Madness is the market-leading free-to-play social casino business. Founded in 2007, it has grown into one of the world’s largest mobile game publishers. Headquartered in London with studios worldwide, Product Madness has developed an impressive catalogue of free-to-play social casino titles, including Cashman Casino™, Lightning Link™ Casino, Heart of Vegas™ and Big Fish Casino™, that are enjoyed by millions of players around the world. The Product Madness reporting segment includes both Product Madness and Big Fish Games, Aristocrat’s social casual games business.¹



Aristocrat Interactive is a regulated online real money gaming (**RMG**) business that was formed in 2024 with the combination of Anaxi and the NeoGames businesses. With a commitment to responsible gameplay, the business delivers content and technology solutions for online RMG, with a full-service offering that includes content, proprietary technology platforms and a range of value-added services across iLottery, iGaming and Online Sports Betting, and Customer Experience Solutions.

C. Our group-wide approach to modern slavery compliance

Aristocrat’s three global business units each have distinct product sets, growth opportunities and geographical footprints. As we continue to grow and evolve, our operations are increasingly united by the common thread of content creation for regulated gaming and social slots, as well as building unified enterprise technology. We are strengthening collaboration across our global teams to create global purpose and culture. Shared values aim to drive us forward with impact, no matter where we work across Aristocrat’s operations.

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. 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. Integration plans are established when we acquire new businesses. The length of time taken to integrate new businesses into our modern slavery program depends on the size and complexity of each business. Full integration of the NeoGames business into our program is ongoing and we expect to complete this integration in the next reporting period.

¹During the reporting period, we completed the divestment of Plarium and following year-end, our Big Fish Games assets were also divested.



II. What we do: Our operations and supply chains

A. Our operations



88%

Full-time or part-time permanent employees

65% Male Workers

24% Female Workers

>1% Non-Binary

10% Undisclosed

1. Aristocrat Gaming Australia

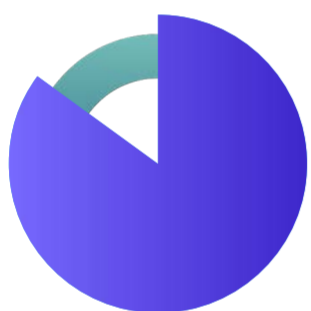
ALL, Aristocrat International Pty Ltd, Aristocrat Global Holdings Pty Ltd and Aristocrat Technical Services Pty Ltd, which comprise four out of the six Aristocrat Australian reporting entities, are all holding companies only and do not carry out operations themselves. Aristocrat Technologies Australia Pty Limited (**ATA**) is the only operational entity.

ATA's principal activities include the integration (assembly of EGMs and gaming systems), 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 are based in Australia. **In FY25, ATA had approximately 1100 workers. About 88 per cent were full-time or part-time permanent employees**, and the remainder were contingent workers, including temporary, agency or contracted workers. Approximately 65 per cent of all ATA workers were male, 24 per cent were female, less than 1 per cent were non-binary and 10 per cent did not disclose their gender. The other Aristocrat Australian Reporting Entities did not employ any workers.



84%

Full-time or part-time permanent employees

56% Male Workers

30% Female Workers

14% Undisclosed

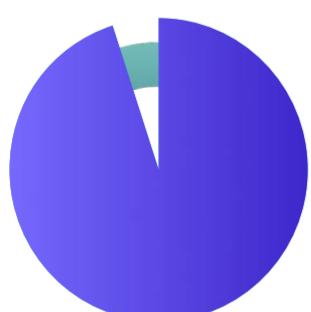
2. Aristocrat Gaming EMEA

Aristocrat Technologies Europe Limited (**A TEL**) is one of Aristocrat's UK Reporting Entities and, along with Aristocrat Technologies Spain SL (**ATSS**), is an operational entity for the Aristocrat Gaming business across the EMEA region.

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

A TEL and ATSS do business in, or have a permanent and contingent workforce residing in, Austria, Bulgaria, Croatia, Cyprus, Czechia, France, Germany, Netherlands, South Africa, Spain and the UK. Their operations do not include Product Madness or Aristocrat Interactive.

In FY25, A TEL and ATSS had approximately 115 workers. Approximately 84 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, approximately 93 per cent of the permanent and contingent workers of A TEL and ATSS were based in the UK, Austria and Spain. Approximately 56 per cent of all A TEL and ATSS workers were male, 30 per cent were female, and 14 per cent did not disclose their gender.



97%

Full-time or part-time permanent employees

90% Male Workers

7% Female Workers

3% Undisclosed

3. Aristocrat Gaming Canada

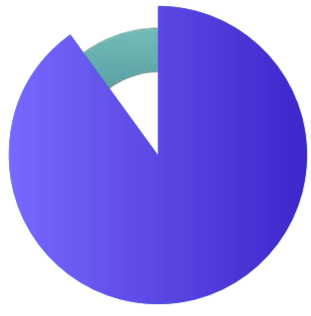
Aristocrat Technologies Canada, Inc (**ATCI**) is Aristocrat's Canadian Reporting Entity, and carries out operations for the Aristocrat Gaming business unit in Canada.

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. **In FY25, ATCI had approximately 30 workers based in Canada, the majority of which were full-time or part-time permanent employees.** Approximately 90 per cent of all ATCI workers were male, 7 per cent were female and 3 per cent did not disclose their gender.



A. Our operations



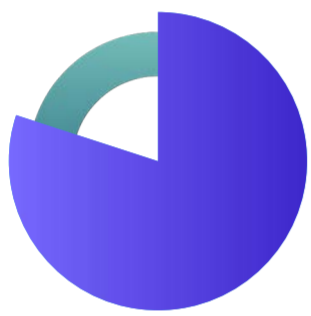
91%

Full-time or part-time permanent employees

57% Male Workers

34% Female Workers

9% Undisclosed



82%

Full-time or part-time permanent employees

65% Male Workers

30% Female Workers

5% Undisclosed

4. Product Madness

Product Madness (UK) Limited (**PML**) is one of Aristocrat's UK Reporting Entities and along with its direct and indirect subsidiaries and other related entities across the Group, carries out operations for Aristocrat's free-to-play social casino business unit. PML's principal activities are to provide development, operational and support services in respect of free to play, social casino and casual games which are published by related entities, Product Madness, Inc. and Big Fish Games, Inc., both of which are 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 primarily in the UK.² **In FY25, PML and its relevant subsidiaries had approximately 750 workers. Approximately 91 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 34 per cent of the permanent and contingent workers of PML and its subsidiaries were based in the UK. Approximately 57 per cent of all workers were male, 34 per cent were female and 9 per cent did not disclose their gender.

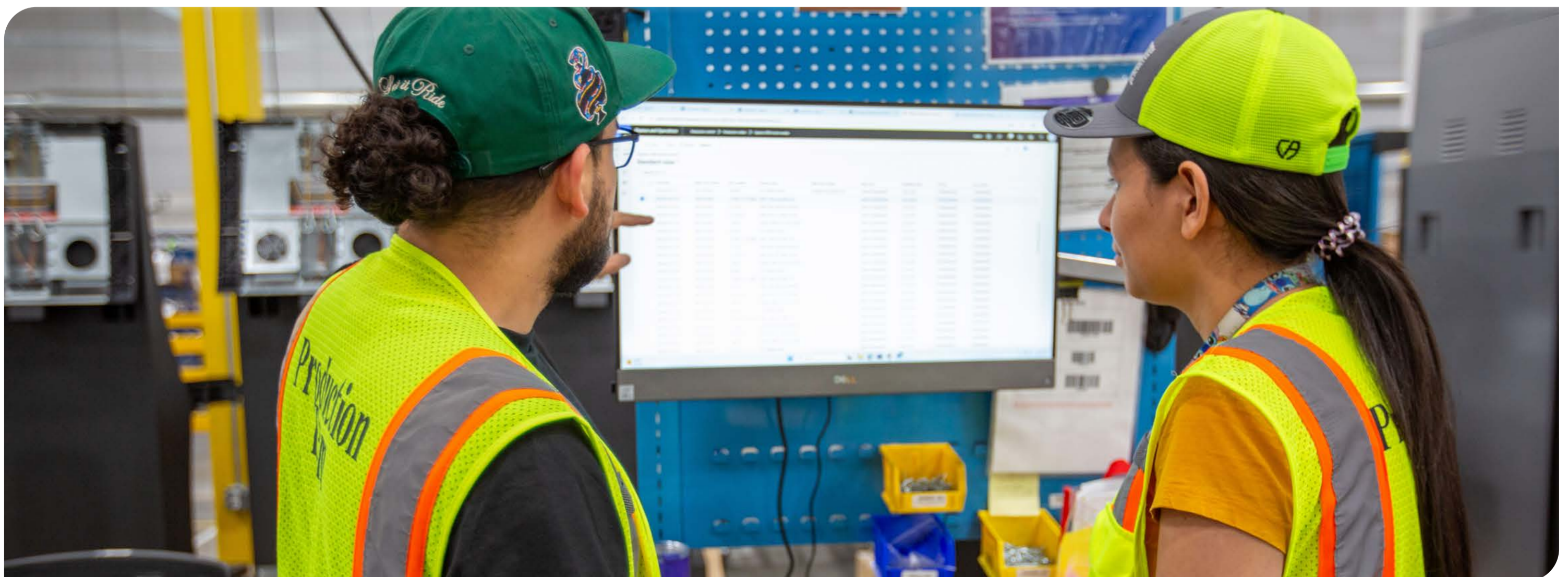
5. Aristocrat Interactive

Many of the entities engaged in business activities for Aristocrat Interactive are subsidiaries of Aristocrat Technology Gaming Systems Pty Ltd (**ATGS**). However, ATGS is a holding company only that does not employ workers or carry out operations itself; rather it exists as the entity used to acquire the NeoGames group of companies. Direct and indirect subsidiaries of ATGS, together with other related entities across the Group, carry out operations for the Aristocrat Interactive business unit including the delivery of content and technology solutions for online RMG and land-based casinos, and providing full-service offerings that include content aggregation, proprietary technology platforms and a range of value-added services across iLottery, iGaming and online sports betting, and customer experience solutions.

Aristocrat Interactive's activities are supported by group companies located in Israel, the UK, Malta, Gibraltar, Ukraine, Spain, North Macedonia, Bulgaria, Czechia, Luxembourg, the Philippines, Poland, Italy, India, Isle of Man, British Virgin Islands and the USA.

In FY25, the group companies under Aristocrat Interactive had approximately 1400 workers. Approximately 82 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 92 per cent of permanent and contingent workers were based in Bulgaria, Israel, Malta, North Macedonia, Poland, Ukraine and the UK. Approximately 65 per cent of all workers were male, 30 per cent were female and 5 per cent did not disclose their gender.

² PML may have a limited number (fewer than 20 in total) of permanent and contingent workforce residing in countries which include Brazil, Croatia, Georgia, Lithuania, Poland, Serbia and Ukraine.





B. Community impact

Aristocrat strives to make a positive contribution to the communities in which our people live and work. We believe that business success and community wellbeing go hand in hand, and that harnessing the passion and creativity of our people in this effort is essential.

Our people operate in diverse communities around the globe, each with unique cultural, social, and economic contexts. We embrace this diversity, and encourage our employees to actively participate in community initiatives that reflect our shared company values, and local priorities.

Our approach is decentralised yet unified, empowering teams to lead with purpose while aligning with our global strategy. We provide our people with tools, resources, and autonomy to deliver impactful programs and support causes that are close to their hearts. Whether it is volunteering time, donating funds, or building long-term partnerships, Aristocrat's approach is both practical and flexible.



Aristocrat Cares is our strategic framework for giving. In the United States, it serves as our flagship community engagement program. It is designed to deepen relationships with community partners, expand our reach, and measure the impact of our philanthropic efforts. Through a structured grant scheme, we also provide financial support to not-for-profit organisations that align with our values and strategic priorities. By embedding community engagement into our global strategy, we aim to amplify our impact and ensure that our efforts are sustainable, inclusive and aligned with the needs of the communities in which we operate.

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 FY25, please visit www.aristocrat.com/sustainability.



C. Our supply chains

Aristocrat's supply chain is global and multifaceted. Given the diverse nature of our businesses, the Group has several supply chains that support the delivery of value to our customers. Effectively managing our supply chain enables Aristocrat to maintain consistent delivery of products to customers while also sustaining operational resilience in a volatile global environment. We adopt a multi-tiered approach to governance over our supply chain including through regular engagement with our key direct suppliers and large-scale sub-tier suppliers as well as through supplier due diligence, performance and risk assessments.

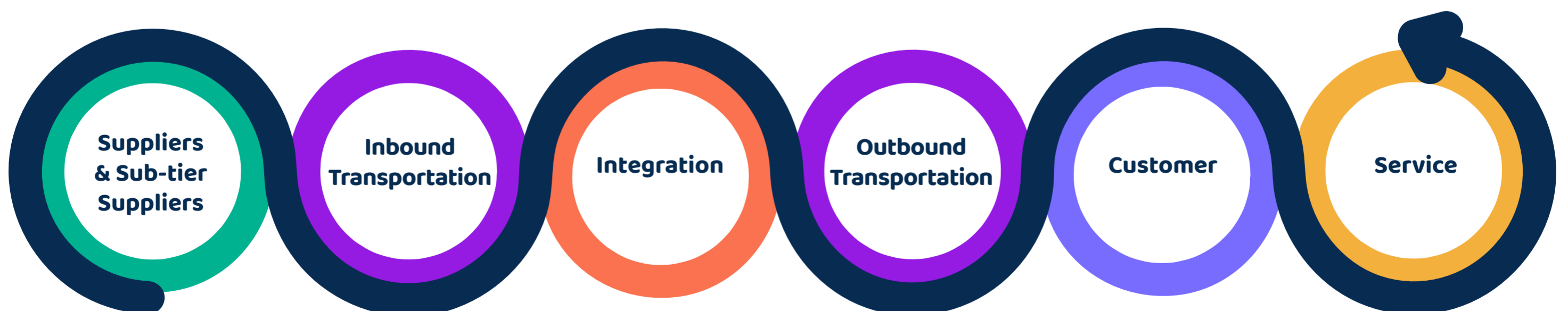
The supply chains have differing levels of modern slavery risk (as discussed in [Potential Risks in our Supply Chain](#)).

1. Hardware supply chain

The hardware supply chain provides components for our EGMs and supports the Gaming business. The risks linked to the electronics industry are covered in [Potential Risks in our Supply Chain](#).

In this reporting period, approximately 97 percent of our spend for the hardware supply chain was attributed to 42 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 below shows the hardware supply chain.

Hardware Supply Chain





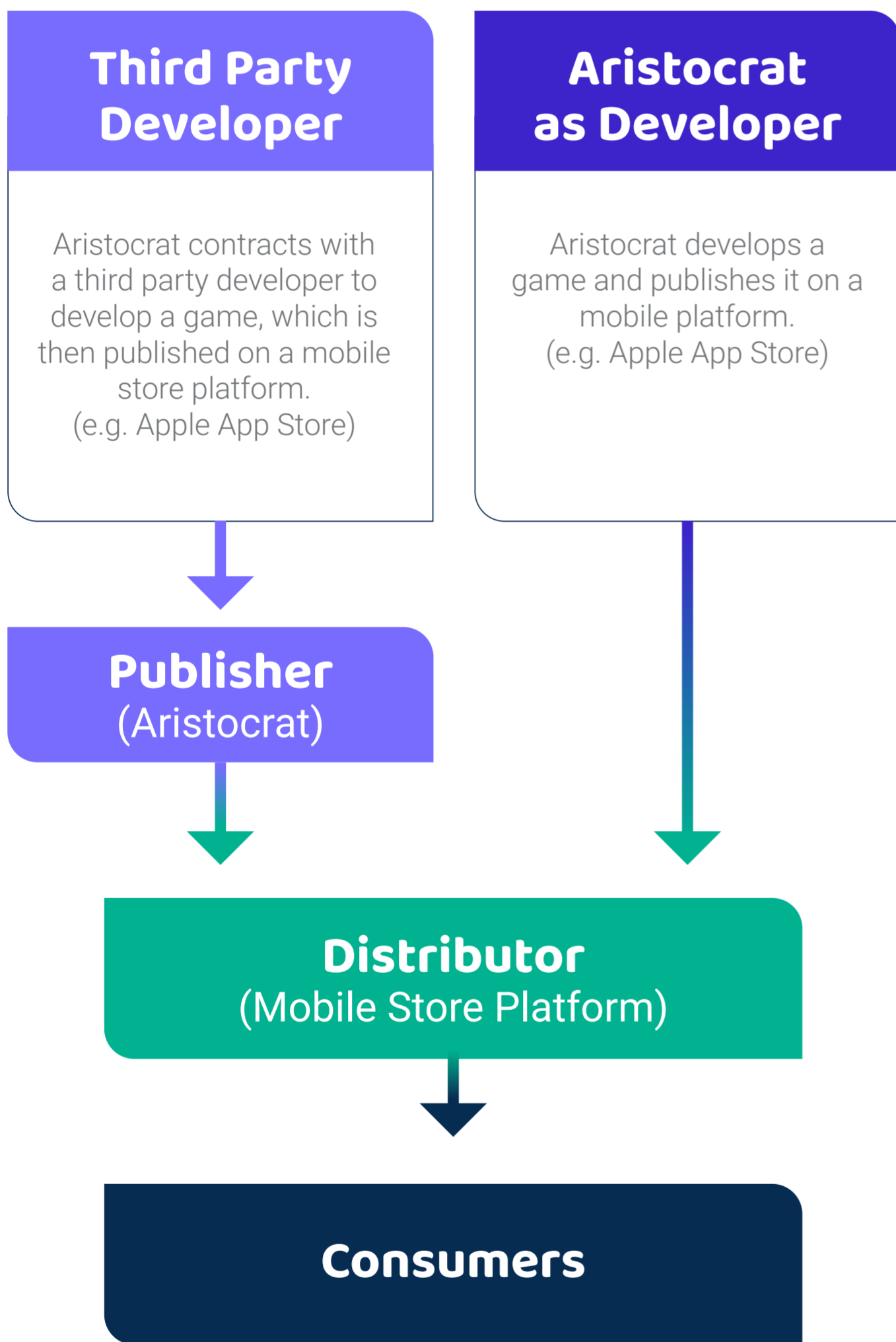
2. Digital supply chain

In this reporting period, approximately 95 percent of our spend for the digital supply chain was attributed to approximately 361 direct suppliers. The digital businesses, which include Product Madness, Big Fish and parts of the Aristocrat Interactive business, have two types of supply

chains as shown in the diagrams (below). The risks in the digital supply chains are predominantly linked to working conditions tied to services delivered by contractors/temporary workers, as discussed in [Potential Risks in our Supply Chain](#).

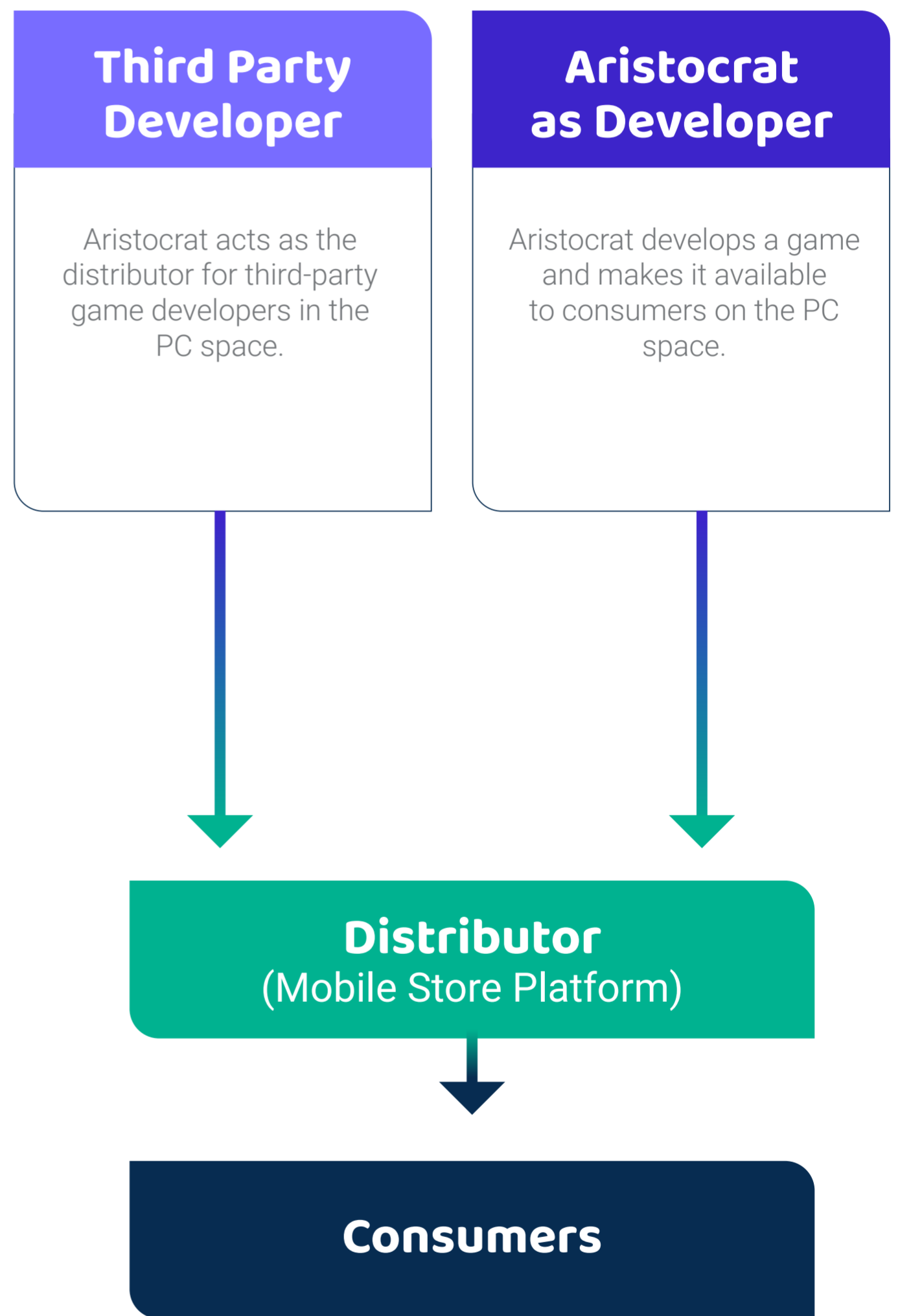
Mobile-Driven Value Chain

Aristocrat makes free-to-play or real money games available for download on third-party online store platforms, such as the Apple App Store or Google Play or third-party operator websites.



Online Value Chain

Aristocrat offers free-to-play or real money games for download or play on its own or third-party websites.



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.

3. Interactive supply chain

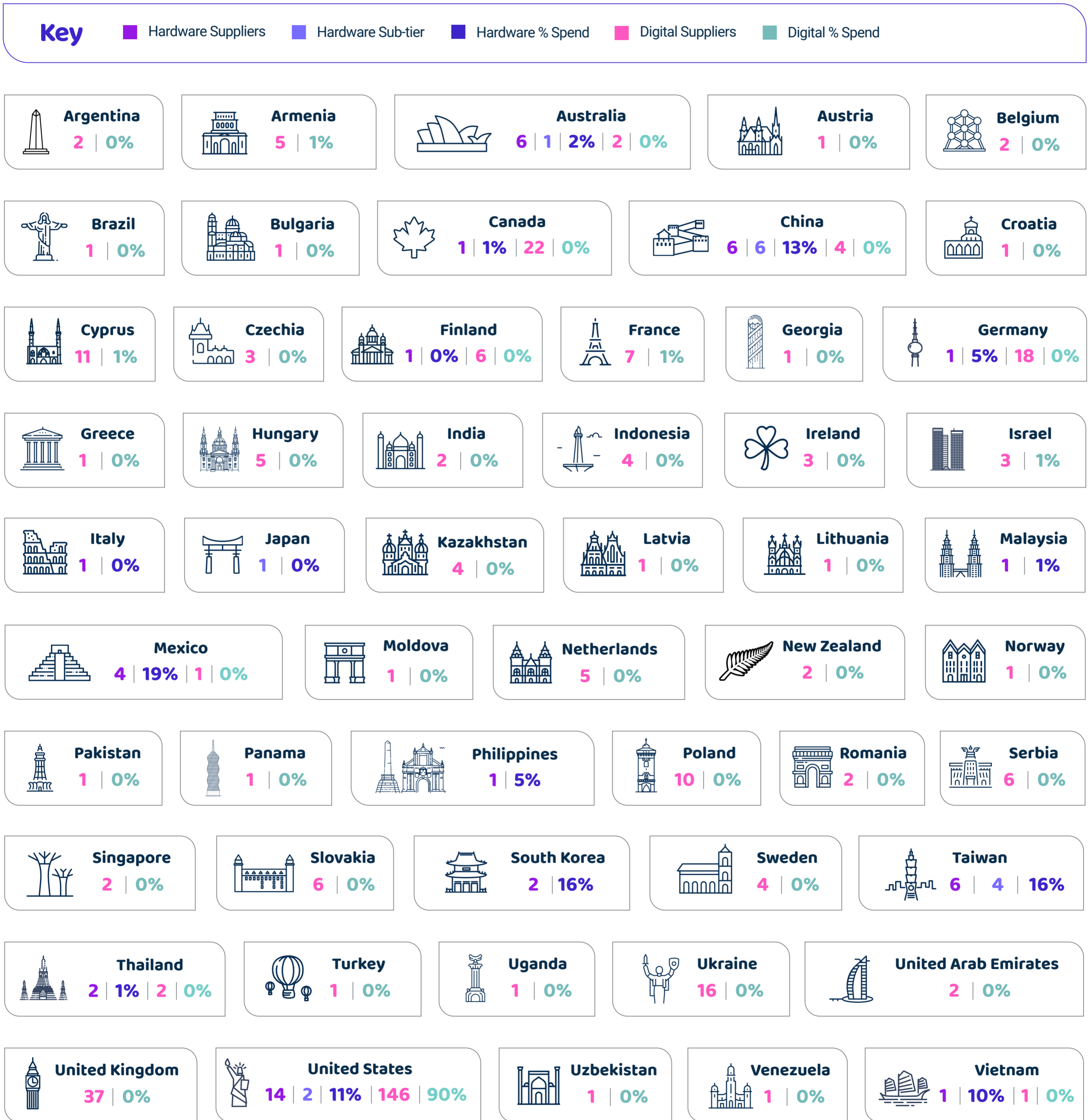
The Aristocrat Interactive business faces similar modern slavery risks in its operations as our Product Madness business, that is working conditions tied to services delivered by contractors/temporary workers, albeit with people and operations in some jurisdictions with a higher risk of modern slavery practices. Further supply chain mapping for Aristocrat Interactive will be done in FY26 and beyond.



4. Location of suppliers

Our supply chain consists of approximately 417 key direct suppliers and sub-tier suppliers across 54 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.

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



Note 1: Hardware 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 location 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.

Note 2: where supplier spend is shown as ‘0%’ (excluding hardware sub-tier suppliers), this means that spend is less than 1% and would only show up if we reflected 3 decimal places.

Note 3: the data for UK includes 4 suppliers in the British Virgin Islands.

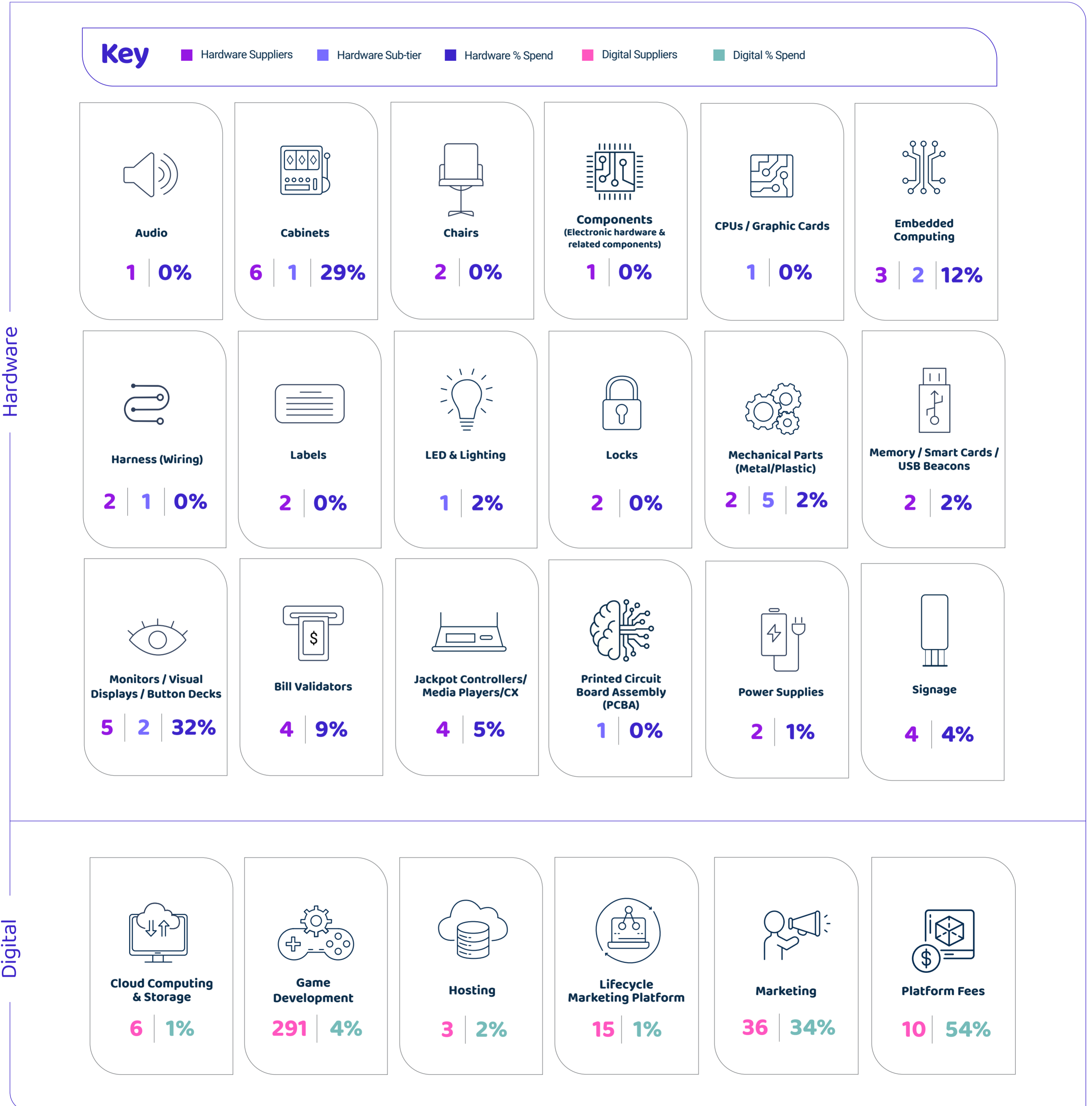
Note 4: the locations shown for hardware suppliers are manufacturing locations and some suppliers may manufacture in more than one location.



5. Product and service categories

In this Statement, we have provided details around the product and service categories in both our hardware and digital supply chains.

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



Note 1: Hardware 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.

Note 2: where supplier spend is shown as ‘0%’ (excluding hardware sub-tier suppliers), this means that spend is less than 1% and would only show up if we reflected 3 decimal places.



6. Indirect sourcing

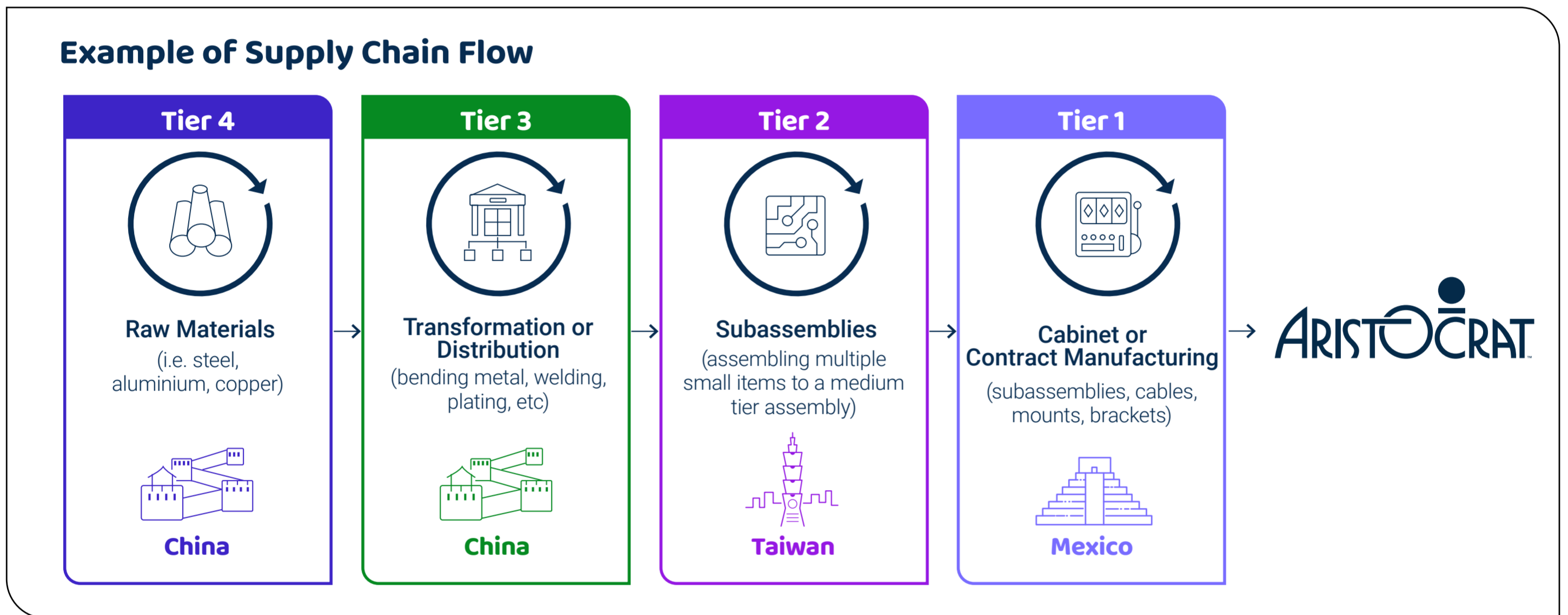
Our indirect suppliers provide goods and services that support the Group’s day-to-day operations across Aristocrat Gaming, Product Madness, and Aristocrat Interactive. These include suppliers for travel, technology, utilities, facility management, learning and development, marketing, professional services, and more.

7. Understanding our supply chain

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

a. Multi-tiered supply chain visibility and monitoring

To enhance transparency and address both holistic risk and modern slavery compliance, we have implemented a supply chain mapping solution that provides visibility beyond our immediate suppliers. This platform enables us to identify sub-tier relationships, allocate risk scores, and monitor potential disruptions across multiple tiers. By partnering with key hardware suppliers to gather location data and expanding mapping to sub-tier levels, we gain a clearer picture of our global supply chain. This visibility helps us identify vulnerabilities and where deeper due diligence on modern slavery risks may be conducted, supporting our commitment to responsible sourcing and ethical standards across all tiers.



b. Gaming regulations and technical requirements

To comply with gaming regulations and Aristocrat’s technical requirements, the pool of suitable suppliers is necessarily selective. Many of Aristocrat’s proprietary designs require custom-manufactured parts that are not available “off the shelf.” For example, within the hardware portfolio, thousands of specialised custom parts must be sourced through trusted partners, underscoring the importance of close, long term supplier relationships that support quality, innovation, and compliance across our global operations.

c. Level of influence with suppliers

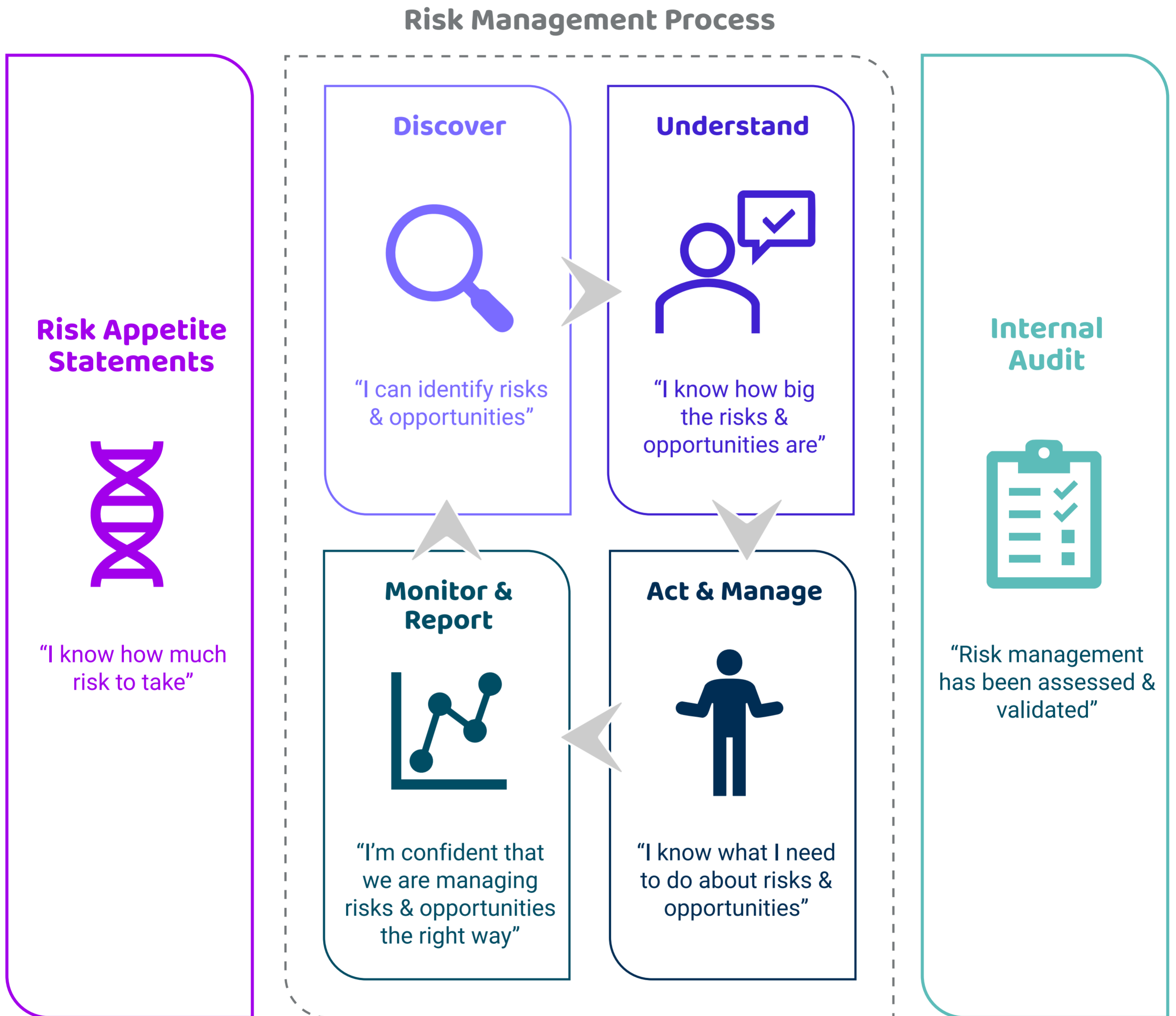
Aristocrat has greater influence on modern slavery awareness, risk identification, and risk mitigation within our hardware suppliers and sub-tier suppliers compared to our indirect or digital suppliers. This influence reflects factors such as supplier size or scale, our partnership history, contractual agreements, and the level of spend. The majority of our direct supplier relationships range from 10 to 25 years and are strategic in nature, further strengthening our ability to collaborate on responsible practices and long-term risk mitigation.

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

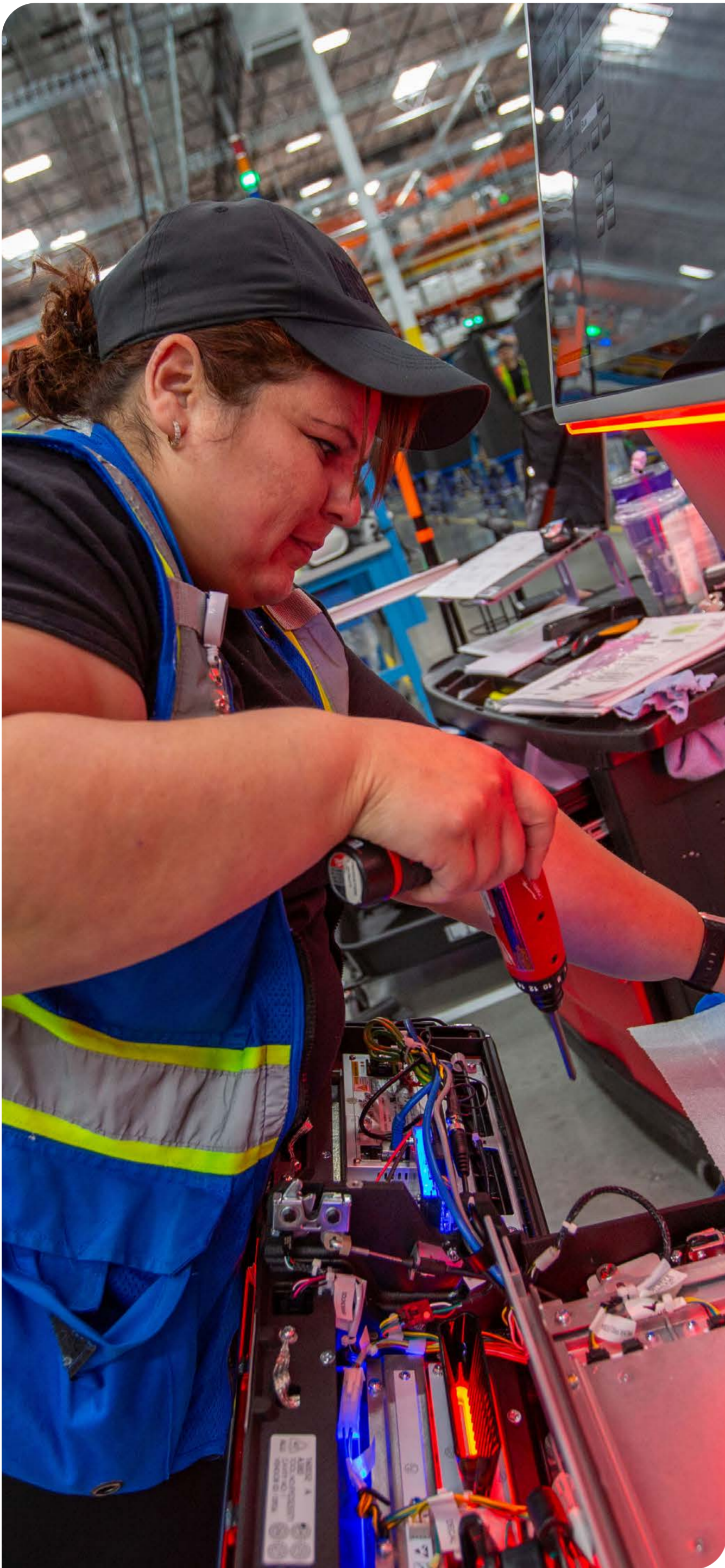


III. The risks of modern slavery in our operations and supply chains

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 Risk Management Framework supports the management of risk at both the enterprise and business unit/functional levels. This supports a 'top-down' and 'bottom-up' approach to risk management, which addresses both financial and non-financial risks.



The Group examines three key indicators to identify 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, and have assigned risk ratings to our countries of operation based on that index³. These country level ratings also inform our approach to supply chain sourcing, helping us identify where supplier relationships may carry elevated risk and where enhanced due diligence is required.



Working condition indicators:

Finally, we consider the following to be potential indicators of poor working conditions:

- 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

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.

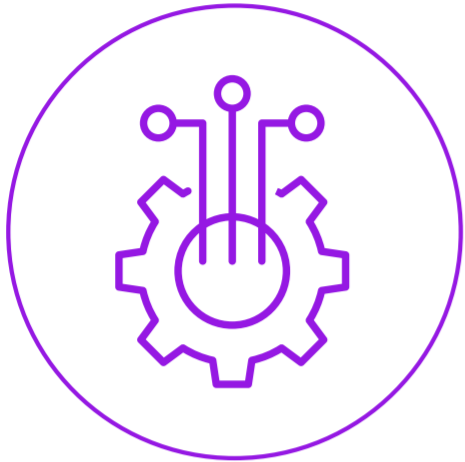
³Walk Free’s 2023 Global Slavery Index can be found at <https://www.walkfree.org/global-slavery-index/map/>.



In the Sections below, we identify the risks of modern slavery practices. These are defined as 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, in alignment with the definitions in the United Nations Guiding Principles on Business and Human Rights (UNGPs). 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 potentially **contribute** to modern slavery, indirectly through our activities.



Risks where Aristocrat could be **directly linked** to modern slavery practices, for example, through our supply chain.

The diagram to the right shows the potential modern slavery risks we have identified within our operations and supply chains.

We recognise that changing external factors, such as geopolitical tensions, technological advancements, and climate change may present increased risks in our operations and supply chain. As risk is not static, we will continue to regularly review our business and its external environment to changes to existing risks and determine whether new risks should be added. Aristocrat continues to proactively prepare and respond to changing risk dynamics by remaining agile, adapting our operations and making timely, risk-informed decisions. During FY25, technology risks grew in prominence, particularly the potential impacts of use of artificial intelligence by our supply chain in responding to our supplier due diligence, performance and risk assessments. Also, macroeconomic conditions remained uncertain driven by global geopolitical instability and trade wars, and we continued to apply operational agility to support both our own operations and our supply chain while maintaining consistent delivery of products to customers.

Given the size and complexity of our supply chains (as described in Section II), our risk assessment efforts in the short- and medium-term have been focused on tier one hardware suppliers, where we can leverage our influence and long-standing relationships to identify and mitigate modern slavery risks through supplier audits and other targeted actions (see Section II(C)(7)). In FY25 we also increased our visibility into our sub-tier suppliers to understand the electronic components purchased by our tier one suppliers. In parallel, we have also carried out risk assessments on our own operations, particularly our employment practices, and we will continue to assess other areas of our operations and supply chains in a prioritised and risk-based manner.

In our operations...

Through our own employment practices, the Group could potentially **cause** modern slavery through the risk that our workers are exploited, prevented from exercising their labour rights, or subjected to unfavourable working conditions. We consider the risk of modern slavery in our direct operations to be low due to our policies, processes and controls as well as our grievance mechanisms.

Through our engagement of contractors and temporary workers, the Group could potentially **contribute** to or be **directly linked** to modern slavery, as the compliance practices of recruitment agencies and other third parties may not be fully visible to Aristocrat resulting in a risk that contractors and temporary workers are exploited, prevented from exercising their labour rights, or subjected to unfavourable working conditions.

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 or are connected with 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 or are connected with 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 or if we procure services from contractors who are connected to modern slavery practices.

No modern slavery incidents

During the reporting period, Aristocrat did not cause, contribute to, or have any direct involvement in, a modern slavery incident. We did not identify any cases of modern slavery for review and as such, we did not refer any cases or matters to law enforcement or other regulatory bodies.



A. Potential risks in our operations

↑ Level of risk is expected to **increase**
 ↓ Level of risk is expected to **decrease**
 → Level of risk is expected to **remain the same**

Potential Risk

Current Risk Status & Mitigations



Working Condition

Employment practices for direct/permanent workers may not be compliant with laws in applicable jurisdictions.

Although we acknowledge that Aristocrat, as with all employers, could in theory cause this modern slavery risk, we consider the likelihood of this risk to be mitigated due to the following measures in place:

- Employee pay and benefits are governed by the Aristocrat Global Reward Policy that specifies median market pay for local and regional locations.
- 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.
- 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.
- 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.

Assessed Risk Change over Reporting Period

Projected Risk Change over Next Year

Projected Risk Change Rationale

Future Mitigations Under Consideration

The risk change over the reporting period was consistent with our projection from the previous reporting period (i.e. that the level of risk was expected to remain the same).

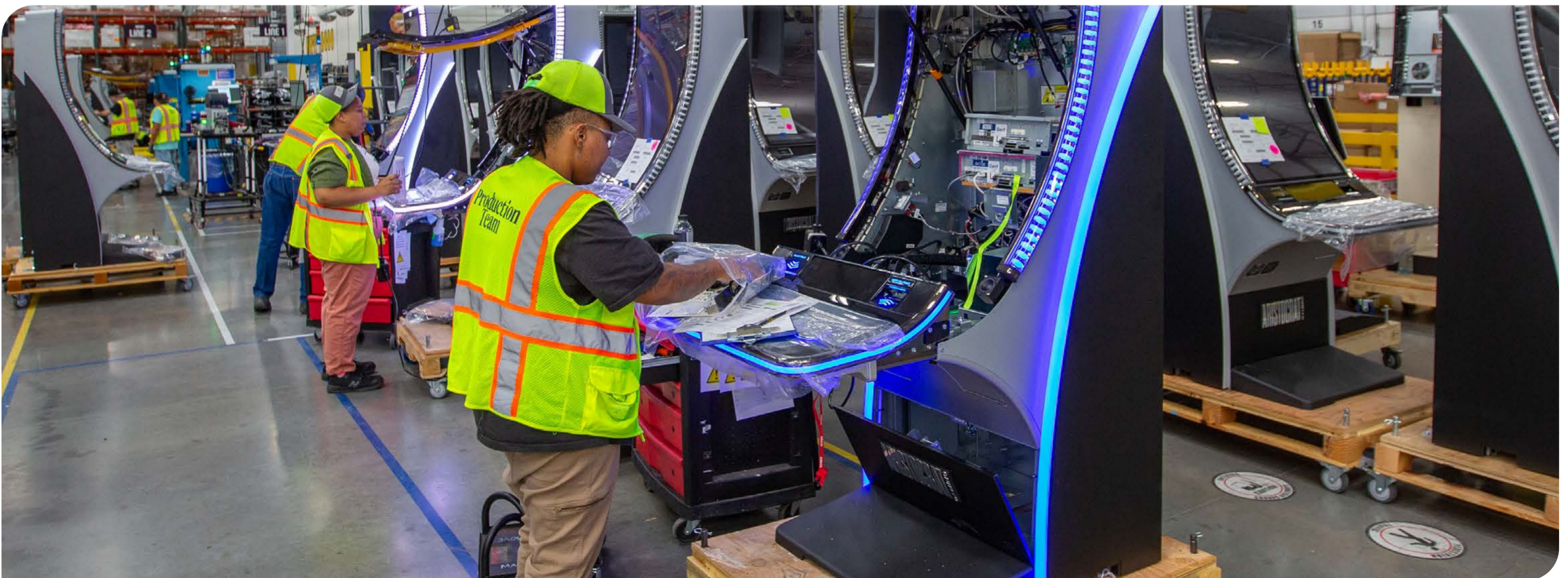


As a global company, we acknowledge that we operate in countries where geopolitical tension exists, as illustrated on the map. We are also prepared to navigate complex geopolitical situations as they arise throughout the world, including maintaining the health and safety of our people globally.

This risk and its mitigations will continue to be reviewed as part of the standard People & Culture processes and in line with the Group's Business Resilience Framework.



Cause





A. Potential risks in our operations

↑ Level of risk is expected to **increase** ↓ Level of risk is expected to **decrease** → Level of risk is expected to **remain the same**

Potential Risk

Current Risk Status & Mitigations



Working Condition

Employment practices for contractors/ temporary workers may not be compliant with laws in the applicable jurisdictions.



Directly Linked



Contribute

There are times when we engage temporary workers directly or through an employer of record arrangement. 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).

When directly engaging temporary workers and contractors, we have written agreements with these workers governing their engagement with Aristocrat, including:

- Key terms provided in writing in a language they will understand;
- The freedom to terminate their employment at any time;
- Appropriate notice termination provisions in favour of the contractor/temporary worker; and
- The freedom to refuse overtime work and leave the premises at the end of their shift.

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 convert these workers to permanent employees on the same terms as current employees where the engagement is more than a temporary engagement.

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.




We have also developed a standalone risk questionnaire for our People & 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.




Assessed Risk Change over Reporting Period	Projected Risk Change over Next Year	Projected Risk Change Rationale	Future Mitigations Under Consideration
<p>The risk change over the reporting period was consistent with our projection from the previous reporting period (i.e. that the level of risk was expected to remain the same).</p> <p>As part of the cross functional project to review contingent worker engagements in the context of Aristocrat's location strategy, some regional policies (e.g. in the US) have been developed to standardise the engagement process for contractors/ temporary workers. Modern slavery considerations have been added to these policies as a risk mitigation measure.</p>	→	There is no current projected change to the practice or frequency of using contractors/ temporary workers.	<p>The cross functional project will continue and opportunities to embed modern slavery risk considerations into processes and documents will be identified.</p> <p>We are also continuing to expand the inclusion of contractual clauses for staffing agreements so that all agreements for the engagement of contractors/temporary workers will include the relevant clauses.</p>



A. Potential risks in our operations

Level of risk is expected to **increase**
 Level of risk is expected to **decrease**
 Level of risk is expected to **remain the same**

Potential Risk	Current Risk Status & Mitigations			
 <p>Industry, sector, product</p> <p>Companies we have recently acquired or have invested in may have significant modern slavery risks or may engage in modern slavery practices.</p> <div style="display: flex; justify-content: space-around;"> <div style="text-align: center;">  <p>Directly Linked</p> </div> <div style="text-align: center;">  <p>Contribute</p> </div> </div>	<p>The Mergers & Acquisitions (M&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>			
	Assessed Risk Change over Reporting Period	Projected Risk Change over Next Year	Projected Risk Change Rationale	Future Mitigations Under Consideration
	There was no projected risk change due to the nature of this risk.	N/A	Any further disclosure about the Group's future strategies regarding potential M&A activity would be likely to result in unreasonable prejudice to the Group.	This risk and its mitigating actions will continue to be reviewed through implementation of the due diligence process and post-acquisition reviews of the effectiveness of the integration playbook, and appropriate updates will be made as required.

Potential Risk	Current Risk Status & Mitigations			
 <p>Geographic</p> <p>Modern slavery practices may be found within our operations.</p> <div style="text-align: center;">  <p>Cause</p> </div>	<p>The majority, approximately 63%, of the Group's employees are in locations that have been identified in the Global Slavery Index 2023 as having a lower prevalence of modern slavery.</p> <p>A small percentage, approximately 7%, of our employees are in locations with a medium prevalence of modern slavery. Approximately 30% of our employees are in locations with a high prevalence of modern slavery.</p> <p>We note that 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 Section IV 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>			
	Assessed Risk Change over Reporting Period	Projected Risk Change over Next Year	Projected Risk Change Rationale	Future Mitigations Under Consideration
	While the risk change was assessed to increase over the reporting period due to the acquisition of NeoGames and the resultant presence of employees in higher-risk locations, this risk was addressed as part of the NeoGames integration process.		As a global company, we acknowledge that we operate, and have employees, in countries with a higher prevalence of modern slavery. Our current employment practices are aimed at mitigating these geographic risks and maintaining the health and safety of our people globally.	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&A integration plans, we will work to incorporate newly acquired companies and their employees into the standard Aristocrat policies and processes.



A. Potential risks in our operations

↑ Level of risk is expected to **increase**

↓ Level of risk is expected to **decrease**

→ Level of risk is expected to **remain the same**

Potential Risk

Current Risk Status & Mitigations



Although not formally part of our business supply chain, we still acknowledge the risk associated with donated or promotional goods.

Aristocrat has determined that the modern slavery risk may be heightened, when:

- 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;
- there are allegations of poor or unlawful employment practices by the supplier;
- promotional products and branded merchandise are associated with low cost and high-volume manufacturing;
- products possibly contain materials that are known to be higher risk (e.g., cotton from the Xinjiang region of China).

Industry, sector, product

Goods that we donate or are used for promotional products may have been manufactured by or sourced from suppliers that engage in modern slavery practices.



Directly Linked



Contribute

Assessed Risk Change over Reporting Period

Aristocrat has not identified any specific instances of heightened modern slavery risk in our donations in this reporting period. We will continue to monitor this potential risk in future reporting periods.

Projected Risk Change over Next Year



Projected Risk Change Rationale

The types of goods that would be donated or used for promotional purposes are not expected to change significantly in the next year.

Future Mitigations Under Consideration

We will continue to look at conducting modern slavery risk assessments for our internal operations in a prioritised risk-based manner to understand the risks regarding donation of goods and acting on any identified risks in accordance with our policies and processes.





B. Potential risks in our supply chains

↑ Level of risk is expected to **increase**

↓ Level of risk is expected to **decrease**

→ Level of risk is expected to **remain the same**

Potential Risk

Current Risk Status & Mitigations



Industry, sector, product

Business Area:

Supply Chain - Direct

Forced labour and/or child labour may be used in our suppliers' operations.



Directly Linked



Contribute

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.

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.

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.

Aristocrat has long-term relationships with its key direct suppliers which supports an environment of open and collaborative engagement.

Assessed Risk Change over Reporting Period

The risk change over the reporting period was consistent with our projection from the previous reporting period (i.e. that the level of risk was expected to remain the same).

We increased the number of supplier audits conducted this year, providing us with greater visibility into potential modern slavery risks across our supply chain. While no incidents of modern slavery were identified or reported, areas for improvement were identified and our suppliers have been forthcoming with information and documentation. They have demonstrated a willingness to work collaboratively with the Group to ensure that modern slavery risks are identified, suppliers are educated on the topic, and appropriate control measures are in place.

For further information on these remediation actions, please see [Section IV\(B\)\(2\)](#) below.

We also increased visibility into the sub-tier supply chain to understand the electronic components purchased by our tier 1 suppliers.

Projected Risk Change over Next Year



Projected Risk Change Rationale

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 are likely to remain unchanged year on year.

Although we expect the level of risk to remain the same, our visibility of the risk within our suppliers' operations will increase as a result of ongoing supplier visits and on-site audits. See below regarding the potential risk associated with our suppliers' employment practices.

Future Mitigations Under Consideration

In the next financial year, we will continue to conduct supplier visits and on-site modern slavery audits. Internal reviews will be maintained, and corrective actions will be implemented with suppliers where necessary.

To enhance our compliance posture and meet stakeholder expectations, we are exploring options to engage a third-party ethical trade compliance platform that offers centralised supplier data management, independent audit capabilities, and benchmarking tools for modern slavery risk across global supply chains.

The third-party platform will support independent supplier audits focused on labour rights and working conditions, enable suppliers to complete self-assessment questionnaires, and facilitate corrective action planning and continuous improvement tracking. We intend to use this platform to validate supplier responses to modern slavery assessments, benchmark supplier performance against industry standards, and centralise audit documentation to enhance reporting for internal governance and external disclosures.

We will also refresh our modern slavery supplier survey targeting both direct and indirect strategic suppliers to assess program maturity and identify potential risks.

We will continue to increase visibility into the sub-tier supply chain to understand the electronic components purchased by our tier one suppliers.



B. Potential risks in our supply chains

Level of risk is expected to **increase**
 Level of risk is expected to **decrease**
 Level of risk is expected to **remain the same**

Potential Risk	Current Risk Status & Mitigations
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Geographic

Business Area:
Supply Chain - Direct

Forced labour and/or child labour practices may be found within our suppliers' operations.

Hardware:

Most hardware suppliers operate in locations 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 Modern Slavery Supplier Survey.

When evaluating potential suppliers, we follow our due diligence process to minimise this risk. Further we conduct regular on-going due diligence of current suppliers.

Digital:

There are 16 countries in the digital supply chain (Product Madness and Aristocrat Interactive), which provides mostly services, that are considered higher risk for modern slavery prevalence. We acknowledge this risk indicator.

Further supply chain mapping for Aristocrat Interactive will be done in FY26 and beyond.



Directly Linked



Contribute

Assessed Risk Change over Reporting Period	Projected Risk Change over Next Year	Projected Risk Change Rationale	Future Mitigations Under Consideration
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The risk level in this reporting period did not increase as anticipated, as none of our suppliers (hardware or digital) commenced manufacturing products in new regions or countries with a higher prevalence of modern slavery.

We have continued to include ethical sourcing clauses in supplier agreements (where possible).



While we expect the risk level to remain the same in the next reporting period based on current supplier operations, this risk could increase in the next reporting period if some of our current suppliers look to manufacture products for Aristocrat in new regions or countries that may have a higher prevalence of modern slavery.

The digital supply chain (Product Madness and Aristocrat Interactive) 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.

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. We will continue to engage with the Sourcing Resiliency Team to gain greater visibility into sub-tier supply.

We will also continue to include our ethical sourcing clauses in our supplier agreements.



B. Potential risks in our supply chains

↑ Level of risk is expected to **increase**

↓ Level of risk is expected to **decrease**

→ Level of risk is expected to **remain the same**

Potential Risk

Current Risk Status & Mitigations



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 Supplier Code of Conduct.

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.

The hardware supply chain has Master Supply Agreements (**MSA**) in place with suppliers covering 97% of our annual spend. The MSA includes specific ethical sourcing and anti-modern slavery clauses, including employment related clauses and also requires these suppliers to comply with the Supplier Code of Conduct.

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 probity checks for suppliers are renewed every three years, while for distributors, they occur annually.

Assessed Risk Change over Reporting Period

Through our supplier audits this reporting period, we gained visibility into suppliers' employment practices and compliance frameworks. While we did not identify any potential indicators of modern slavery or coercive labour practices, the audits provided valuable insights into the maturity of suppliers' governance and human rights programs. Several suppliers demonstrated strong commitments by implementing supplier codes of conduct and human rights policies, which outline expectations for ethical labour practices and respect for fundamental human rights. All audited suppliers confirmed adherence to local labour laws including compliance with child labour regulations, overtime and compensation requirements, and protections for freedom of movement. In addition, suppliers affirmed that their employment practices prohibit forced labour and ensure fair treatment of workers. These findings reflect varying levels of program maturity, with some suppliers exhibiting advanced frameworks and others at earlier stages of development. We view this as an opportunity to continue engaging with suppliers to strengthen policies, enhance training, and build capacity for robust human rights management across our supply chain. For further information on these supplier audits, see [Section IV\(B\)\(2\)](#).

Working Condition

Business Area:

Supply Chain - Direct

Employment practices for our direct suppliers' workers (permanent and/or contractors/ temporary workers) are not compliant with laws in the applicable jurisdictions.



Directly Linked



Contribute

Projected Risk Change over Next Year

Projected Risk Change Rationale

Future Mitigations Under Consideration




Although we expect the level of risk to remain the same, our visibility of the risk within our suppliers' 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.

We will continue audits of hardware suppliers to assess compliance with our Supplier Code of Conduct. In addition, we are considering working with our tier-one suppliers to conduct surveys or audits of sub-tier suppliers, further extending visibility into our supply chain. Earlier this year, Aristocrat released an updated Supplier Code of Conduct, which was well received and appreciated by our suppliers. The revised Supplier Code of Conduct strengthens expectations around human rights, labour standards, and ethical business practices, including explicit commitments to prohibit forced labour, uphold freedom of movement, ensure fair wages and working hours, and comply with child labour laws. It also includes clearer guidance on environmental responsibility, anti-bribery measures, and grievance mechanisms. These enhancements reflect our commitment to continuous improvement and alignment with global best practices. We will continue to engage suppliers to ensure understanding and implementation of these standards across all tiers of our supply chain.




B. Potential risks in our supply chains

Level of risk is expected to **increase**
 Level of risk is expected to **decrease**
 Level of risk is expected to **remain the same**

Potential Risk	Current Risk Status & Mitigations
 <p>Industry, sector, product</p> <p>Business Area: Supply Chain - Indirect</p> <p>Forced labour and/or child labour may be used in our suppliers' operations.</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"> • Cleaning services • Facilities management services (including catering, construction, maintenance and security services) • Warehousing, distribution, and transportation services. <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>

Assessed Risk Change over Reporting Period	Projected Risk Change over Next Year	Projected Risk Change Rationale	Future Mitigations Under Consideration
 Directly Linked  Contribute <p>The risk change over the reporting period was consistent with our projection from the previous reporting period (i.e. that the level of risk was expected to remain the same).</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 Purchase Orders.</p>	<p>We plan to extend the scope of our modern slavery supplier survey to include key indirect suppliers (based on spend and level of risk), which will provide greater visibility of suppliers' operations and labour practices.</p>

Potential Risk	Current Risk Status & Mitigations
 <p>Geographic</p> <p>Business Area: Supply Chain - Indirect</p> <p>Forced labour and/or child labour practices may be found within our suppliers' operations.</p>	<p>Some of our suppliers in the higher risk service sectors noted above are based in geographic locations that have a higher prevalence of modern slavery. For example:</p> <ul style="list-style-type: none"> • in India, Aristocrat has suppliers that provide cleaning and other facilities management services, such as catering and security services • we have distribution arrangements with suppliers in Malaysia, the Philippines and several African countries; and • following acquisitions, indirect suppliers may be located in countries with a higher prevalence of modern slavery. <p>When evaluating potential suppliers, we follow our due diligence process to minimise this risk.</p>

Assessed Risk Change over Reporting Period	Projected Risk Change over Next Year	Projected Risk Change Rationale	Future Mitigations Under Consideration
 Directly Linked  Contribute <p>While the risk change was assessed to increase over the reporting period due to acquisitions and the resultant presence of indirect suppliers in higher-risk locations, this risk was addressed as part of the M&A integration process.</p>		<p>As a global company, we acknowledge that we have suppliers in countries with a higher prevalence of modern slavery. Our current M&A and supplier due diligence practices are aimed at mitigating these geographic risks.</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&A integration plans, we will work to incorporate newly acquired companies and their supplier arrangements into the standard Aristocrat policies and processes, including the risk mitigation actions specified in this table.</p>



B. Potential risks in our supply chains

↑ Level of risk is expected to **increase**

↓ Level of risk is expected to **decrease**

→ Level of risk is expected to **remain the same**

Potential Risk

Current Risk Status & Mitigations



Working Conditions

Business Area:

Supply Chain - Indirect

Employment practices for workers hired through an indirect supplier may not be compliant with laws in the applicable jurisdictions.



Directly Linked



Contribute

We recognise that some locations in which our indirect suppliers operate may afford relatively limited legal protections to workers, and we mitigate this risk through the following actions:

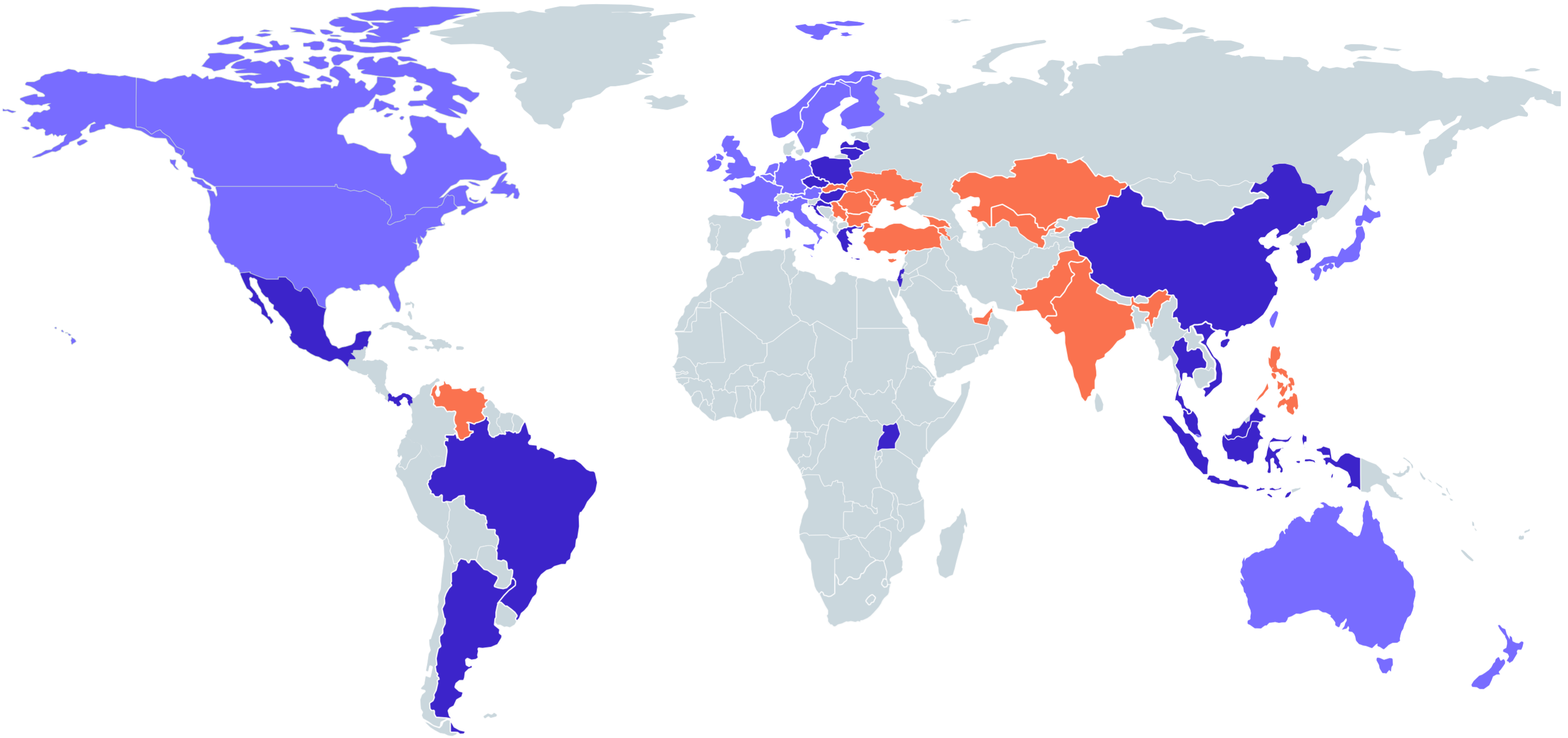
- where possible, we engage staff/suppliers directly, rather than via a third party (such as a property owner or building manager) and include clauses in our supplier contracts requiring compliance with ethical sourcing provisions and relevant laws and standards;
- as part of the vendor setup process in India, checks are performed by Aristocrat (for example, in relation to employment and leave entitlements, insurances and working hours) to ensure the supplier is complying with working conditions as required by the relevant laws and standards; and
- prior to engagement, all distributors undergo detailed probity investigations by Aristocrat's Compliance team. These include checks to identify any material litigation, enforcement actions or adverse media reports, including related to modern slavery issues. Probity renewal investigations are conducted annually for all distributors.

Assessed Risk Change over Reporting Period	Projected Risk Change over Next Year	Projected Risk Change Rationale	Future Mitigations Under Consideration
The risk change over the reporting period was consistent with our projection from the previous reporting period (i.e. that the level of risk was expected to remain the same).	→	We expect this risk associated with working conditions to remain the same given the due diligence and supplier engagement procedures we have in place.	While Aristocrat generally contracts directly with its indirect suppliers and requires suppliers to comply with all applicable laws in its agreements, further work is planned for FY26 and beyond to continue to assess the risks associated with these suppliers and determine the necessary actions to mitigate these risks. This includes expanding the implementation of ethical sourcing and modern slavery clauses to all supplier agreements by way of a reference guide for our global legal team.

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)



Level of risk

Country or Territory and Group

Lower

- Australia
- Austria
- Belgium
- Canada
- Finland
- France
- Germany
- Ireland
- Italy
- Japan
- Netherlands
- New Zealand
- Norway
- Singapore
- Sweden
- Taiwan
- United Kingdom*
- United States

Medium

- Argentina
- Brazil
- China
- Croatia
- Czechia
- Greece
- Hungary
- Indonesia
- Israel
- Latvia
- Lithuania
- Malaysia
- Mexico
- Panama
- Poland
- South Korea
- Thailand
- Uganda
- Vietnam

High

- Armenia
- Bulgaria
- Cyprus
- Georgia
- India
- Kazakhstan
- Moldova
- Pakistan
- Philippines
- Romania
- Serbia
- Slovakia
- Turkey
- Ukraine
- United Arab Emirates
- Uzbekistan
- Venezuela

417
direct suppliers
across
54
countries

Aristocrat's Geographic Risk Categorisation

Countries ranked 1 to 60 on Walk Free's Global Slavery Index 2023 are treated as higher risk, countries ranked 61 to 120 are treated as medium risk, and countries ranked 121 to 180 are treated as lower risk.

*Includes British Virgin Islands



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:



Assess

some of these measures – such as supplier probity checks – are focused on assessing risks associated with specific suppliers;



Address

other measures – such as our Modern Slavery Incident Response Guide – are focused on addressing risks once they have arisen; and



Assess and Address

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 risks⁴

1. Strategic approach

The Modern Slavery Working Group (the **Working Group**) continues to advance Aristocrat’s global anti-modern slavery program (**Anti-Modern Slavery Strategy and Roadmap**). The Anti-Modern Slavery Strategy and Roadmap forms part of, and supports, the Group’s growth strategy, which underpins the activities in the roadmap and guides our decision-making in relation to our anti-modern slavery program.

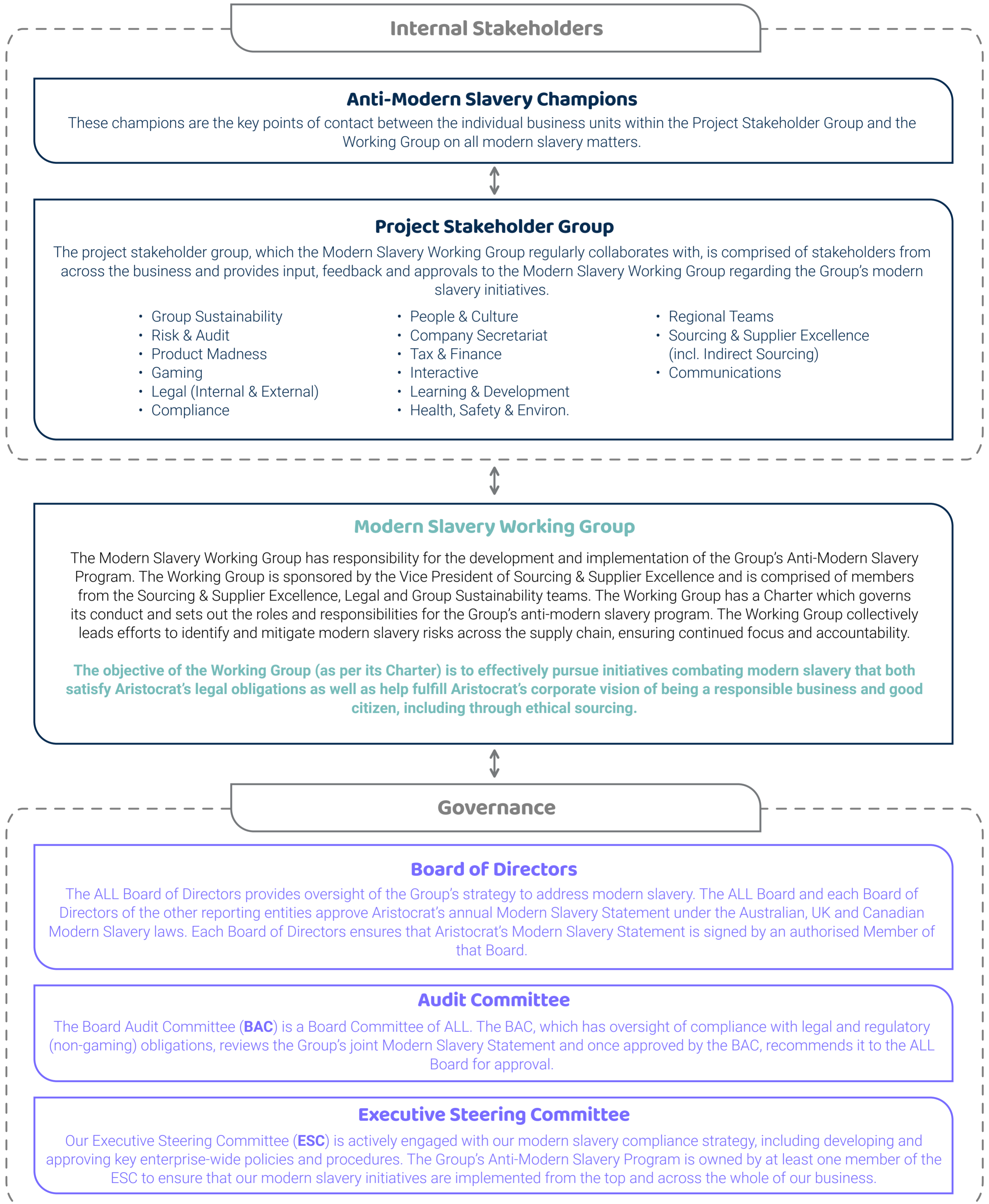
During the reporting period, the Working Group has continued to increase its engagement with Group Sustainability to help support a more coordinated and holistic view of our supply chain. Following the reporting year end, a member of the Group Sustainability team joined the Modern Slavery Working Group. Further, the Working Group has benchmarked various aspects of the Group’s program against other similar businesses, reinforcing its commitment to improvement in this space.

⁴ All entities in the Group are required to comply with our policies and procedures in this space, 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.



2. Governance and stakeholder engagement

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





B. Actions taken to assess, address and remediate risks

1. Foundational actions and controls to assess, address and remediate risks

The information below details the foundational actions and controls used to assess, address and remediate risks. These actions and controls were in place prior to FY25.

a. Policies, Procedures and other Documents

Anti-Modern Slavery Policy



Group employees are subject to the *Anti-Modern Slavery and Human Trafficking Policy*, 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 to, including restricted freedoms, poor working conditions or accommodation, improper financial arrangements, suspicious behaviours and appearances, and geographic risk factors.

Our *Anti-Modern Slavery and Human Trafficking Policy* was updated in FY25 – see [Section IV\(B\)\(2\)](#) for details.

Code of Conduct



Group employees are required to comply with the *Astracrat Code of Conduct*. It summarises important information to support all employees in having a common understanding of Astracrat’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 *Astracrat Code of Conduct*, when they commence employment with Astracrat.

Staffing Agreements



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

● Address ● Assess ● Assess and Address



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 Group’s compliance self-certification questionnaire. This half-yearly questionnaire, required to be completed by leaders globally within the Group, covers key matters to ensure we operate appropriately, safely, and in compliance with regulations and policies.

Indirect Sourcing Policy & Processes



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

The supplier onboarding process for indirect suppliers applies to most of Aristocrat’s operational entities that engage indirect suppliers (with limited exceptions due to operational constraints), covering the majority of indirect spend. This includes all reporting entities covered by this Statement. The onboarding process:

- requires all suppliers to agree to Aristocrat’s Supplier Code of Conduct; and
- requires the majority of potential suppliers to answer questions relating to the risks of modern slavery in their operations and supply chains, and measures they have implemented to mitigate the modern slavery risks in their business.

● Address ● Assess ● Assess and Address



b. Supplier Due Diligence

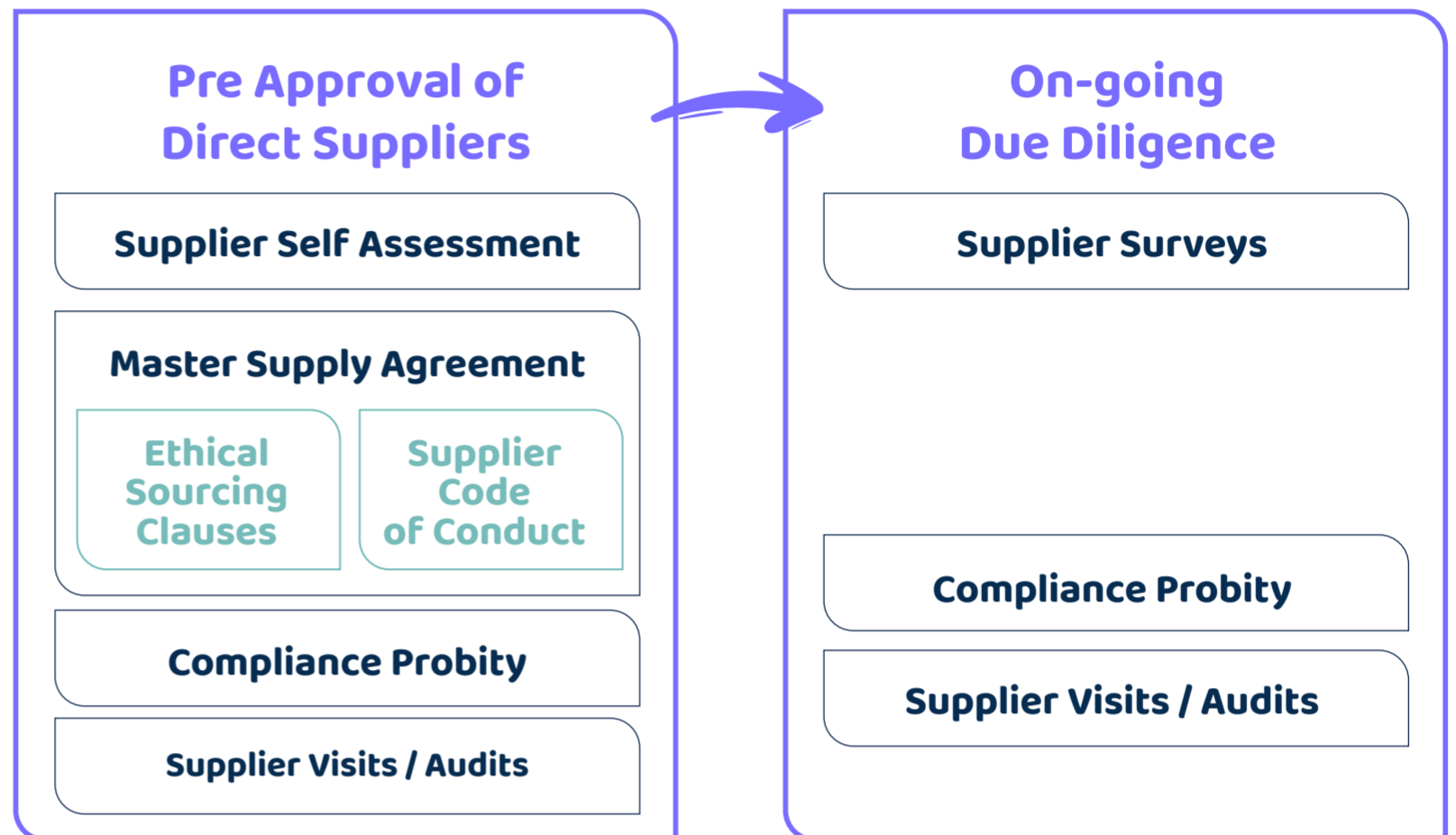
Supplier Due Diligence Process



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 the Sourcing & Supplier Excellence (S&SE) team. It is composed of two key steps:

(1) Pre-approval process –Suppliers are invited to bid for potential work with Aristocrat only after successfully completing the pre-approval process. As part of this process, the responses provided by the suppliers (through surveys, assessments and audits) are critically reviewed and checked for completeness by Aristocrat.

(2) On-going supplier due diligence – Following pre-approval, Aristocrat conducts ongoing due diligence assessments to ensure that suppliers retain the ability to supply products to Aristocrat. This process applies to all new hardware suppliers and/or current hardware suppliers where a considerable amount of new business (or key project work) is going to be awarded. The assessments are required to ensure the supplier has sufficient capability and capacity (human resources, space and equipment) to handle the new business. In addition to operational capability, evaluations also cover the supplier’s business continuity plan / management, social and environmental protection, and ethical sourcing practices. Evaluation of supplier’s ability to perform anticipated work scope prior to commencing source solicitation and selection, as required by policy (excluding probity checks) is renewed every three years, while for distributors, it occurs annually.



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 S&SE 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.

● Address ● Assess ● Assess and Address



Modern Slavery Supplier Survey



The Modern Slavery Supplier Survey requires Key Direct Suppliers and Sub-Tier Suppliers to respond to detailed questions specifically addressing modern slavery issues⁵ 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.

We are planning to refresh the Modern Slavery Supplier Survey in FY26 and expand the scope to include key indirect suppliers (based on spend and level of risk).

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) and template staffing agreements, include ethical sourcing clauses, which require suppliers to comply with all applicable modern slavery, human rights, conflict minerals and related laws. We also aim to include our ethical sourcing clauses in all other supplier agreements where possible.

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 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.

Our Supplier Code of Conduct was updated in FY25 – see [Section IV\(B\)\(2\)](#) for details.

● Address ● Assess ● Assess and Address

⁵The 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 S&SE team conducts periodic site visits and audits to monitor hardware suppliers. The purpose of the supplier audits 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 S&SE 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.

These probity checks are also carried out on a case-by-case basis where higher-risk locations, products and services are identified and flagged to our Compliance team, 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.

● Address

● Assess

● Assess and Address



c. Grievance and complaint mechanisms

Grievance Reporting Process & Whistleblower Program



Aristocrat acknowledges the importance of access to remedies, and the role that grievance and complaint mechanisms can play in addressing risks and facilitating remediation of harm.

Aristocrat's *Global Whistleblower Policy* is the Group's primary global grievance mechanism. It is designed to:

- Encourage individuals to raise concerns about reportable conduct;
- Provide assurance that protections are in place to prevent detrimental treatment for those who speak up; and
- Outline how Aristocrat will investigate and respond to concerns raised.

The *Global Whistleblower Policy* is reviewed at least annually to ensure its continued effectiveness and applicability, and is available to employees via Aristocrat's intranet, as well as to third parties (including customers and suppliers) on Aristocrat's public website.

Employees can report actual or suspected modern slavery incidents through the following channels:

- Dedicated email: reports can be submitted to a dedicated inbox monitored by key members of the Modern Slavery Working Group. This address is communicated to employees through the *Anti-Modern Slavery Policy*, Modern Slavery Incident Response Guide, and Anti-Modern Slavery training; and
- Whistleblower program: concerns can also be reported through Aristocrat's Whistleblower Program (as set out in the *Global Whistleblower Policy*) – either directly to an Eligible Recipient⁶ or anonymously via confidential, third-party reporting channels, including a secure online portal and whistleblower hotline with country-specific phone numbers. Aristocrat strictly prohibits retaliation against anyone who reports concerns in good faith. All reports are assessed to determine whether a formal investigation is necessary.

Our EthicsPoint website can be found at www.aristocrat.ethicspoint.com. The global service is available 24 hours a day, 7 days a week and can be accessed online or by phone. Any grievances, including those relating to modern slavery issues, can be raised through this channel.

The Whistleblower Program is promoted through the *Aristocrat Code of Conduct* and mandatory Compliance Certification training. Details of the program, including access to the *Global Whistleblower Policy* and instructions on how to make a disclosure, are readily available to employees via Aristocrat's intranet. We also proactively share country-specific phone numbers and details of our secure online portal with Key Direct Suppliers that have been engaged through our onsite audits.

Grievance Reporting Process & Whistleblower Program



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.

● Address ● Assess ● Assess and Address

⁶Note: Eligible Recipients within Aristocrat include Senior Managers (defined by Aristocrat as members of the Executive Steering Committee, Managing Director or President of an Aristocrat business unit, and Directors of subsidiaries), Group Head of Risk & Audit, Director of Internal Audit, Board members or Legal practitioners.



d. Training

Modern Slavery Prevention Training



Aristocrat has implemented general modern slavery prevention training for all Aristocrat employees globally, and the ALL Board. The training focuses on how employees can identify and report potential modern slavery incidents.

In addition to general training, Aristocrat has implemented supplementary modern slavery training tailored for specific employee groups:

- Key Supplier-facing employees – this training focuses on potential modern slavery and human trafficking risks in our supply chains, explains our contracting standards for suppliers, and discusses case studies to reinforce practical understanding.
- Key People & Culture employees – this training is designed for team members involved in recruitment and focuses on potential modern slavery and human trafficking risks in our recruitment processes, supported by case studies to illustrate real-world scenarios.

e. Other

Modern Slavery Prevention Training



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 ● Assess and Address



2. Updates in FY25

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.

a. Supplier audits

In our previous Statement, we set out our aim of continuing supplier visits and on-site audits as part of Aristocrat’s commitment to mitigating modern slavery risks in our supply chain. **In FY24, we partnered with a third-party to conduct audits of 4 key suppliers, representing 31 percent of our direct spend. In FY25, we audited 15 Key Direct Suppliers and Sub-Tier Suppliers with whom we have long-standing relationships of between 10 and 25 years. These suppliers represent approximately 32 percent of our direct spend.**

The audits were conducted as part of broader supplier visits, allowing us to expand the reach of our modern slavery assessments. Each supplier was assessed using our modern slavery risk assessment questionnaire and provided supporting documentation, which we reviewed in detail to evaluate governance structures, labour practices, and risk mitigation controls related to modern slavery.

To ensure effective assessments, we trained our sourcing leaders to identify and evaluate suppliers’ approaches to modern slavery. These audits formed part of our wider supplier due diligence, which also included reviews of business and operational practices. All documentation was carefully reviewed to confirm alignment with our anti-modern slavery program. We applied consistent assessment criteria, as established in the previous year, to maintain year-over-year comparability and integrity.

Supplier Program Maturity and Engagement

As part of our FY25 supplier audits, we introduced a Supplier Modern Slavery Program Maturity Rating to evaluate the depth and effectiveness of suppliers’ governance and human rights practices. This rating provides a structured view of program development and informs our engagement strategy. We developed this rating to create a consistent, transparent way to measure supplier program maturity, measure supplier progress, and identify areas for improvement. It has been beneficial to the program by enabling us to prioritise support for suppliers at earlier stages of maturity and recognise those demonstrating strong governance. The scale includes three categories:

- **Robust** – Suppliers with comprehensive policies and control, including formal human rights frameworks, supplier codes of conduct, and proactive risk management measures.
- **Moderate** – Suppliers with foundational policies and practices in place but requiring further development in areas such as training, monitoring, and sub-supplier oversight.
- **Early Development** – Suppliers at an initial stage of implementing modern slavery prevention measures, with limited formalised processes and documentation.

Using this rating scale, we examined suppliers’ initiatives across key areas, including recruitment fee policies, employment contract terms, freedom of movement, working hours, and compliance with our Supplier Code of Conduct. Additional areas assessed included sub-supplier management, freely chosen employment, child labour prevention, humane treatment, non-discrimination, language support, freedom of association, and grievance mechanisms. The areas assessed were consistent with the assessment criteria used for supplier audits in FY24.

Of the 15 suppliers assessed:

- 1 supplier was rated Robust,
- 12 suppliers were rated Moderate, and
- 2 suppliers were rated Early Development.

For the supplier rated Robust, discussions centred on sharing best practices and exploring opportunities to influence sub-tier suppliers. For those in the Moderate and Early Development categories, we focused on closing gaps by recommending enhancements to policies, training programs, and monitoring mechanisms. While the outcome revealed no significant risks, with many suppliers demonstrating their commitment to ethical conduct, upholding labour rights and preventing modern slavery, we will continue to work with these suppliers, especially those rated Moderate or Early Development, to improve outcomes and mitigate risks. This approach ensures continuous improvement and alignment with our ethical standards across the supply chain.

Following this initial assessment process, we leveraged scheduled on-site visits by Aristocrat employees to supplier facilities to validate the accuracy and completeness of responses provided through the assessment process and facilitate meaningful dialogue with supplier management teams. Where possible, these in-person engagements included direct observation of working conditions and, in some instances, workers’ living conditions. Across all audits conducted, no instances of modern slavery were identified, and the overall risk profile of our audited suppliers remained low.

Importantly, suppliers demonstrated a high level of transparency and cooperation throughout the audit process, willingly providing documentation and engaging in open discussions about their practices. This collaborative approach has reinforced our confidence in our direct supply chain and highlighted a shared commitment to ethical labour standards. Moving forward, we will continue to conduct rigorous supplier risk assessments and maintain close engagement with our supplier base supporting the ongoing strengthening and maturity of their modern slavery mitigation programs.

We also continued to monitor the 4 suppliers that we audited last year, to confirm that the agreed improvement plans were being implemented. Further information on some of the remediation actions these suppliers have implemented can be found in [Section IV\(B\)\(4\)](#).

As our on-site visits in this reporting period were part of broader supplier due diligence and were not limited to assessing modern slavery risks, we acknowledge that, in some cases, our auditors were not able to conduct an in-depth evaluation of all supplier facilities. We also recognise the potential risks associated with the use of artificial intelligence by our supply chain in responding to our supplier due diligence and risk assessments, and the impact this can have on the veracity of outcomes. To enhance our audit methodology for FY26, we have made significant progress towards engaging a third-party provider of centralised supplier data management, independent audit capabilities, and benchmarking tools for modern slavery risk across global supply chains. Partnering with this platform is a step forward in advancing our maturity methodology, as it introduces greater consistency, transparency, and comparability in how we assess and manage risk. By leveraging independent expertise and data analytics, we can move beyond reactive compliance toward a proactive, risk-based approach that drives continuous improvement across our supply chain. The third-party platform will:

- support independent supplier audits focused on labour rights and working conditions;
- enable suppliers to complete self-assessment questionnaires; and
- facilitate corrective action planning and continuous improvement tracking.



Recognising Supplier Excellence

Aristocrat has proudly celebrated the outstanding contributions of our key suppliers through our annual recognition program. This initiative honours long-standing achievements that reflect our shared commitment to responsible and ethical business practices. We recognise suppliers who demonstrate excellence in areas such as environmental stewardship, human rights compliance, ethical sourcing, cost and design innovation, and exceptional partnership and support. These awards not only highlight performance but also reinforce the strong, values-driven relationships that enable us to deliver responsibly and sustainably across our global supply chain.

“ At Aristocrat S&SE, our commitment to combating modern slavery is unwavering. The findings from our recent supplier audits were discussed with suppliers and improvement action plans are in place. We are dedicated to ongoing communication and collaboration with key suppliers throughout FY25 to identify and address potential modern slavery risks, enhancing the maturity of our approach to managing potential modern slavery risks within our supply chain.

Reflecting on the audits, our approach has been crucial in addressing potential issues and learning for future audits. Our dedication to open communication and ongoing collaboration underscores our commitment to transparency and continuous improvement. This approach is vital in identifying and addressing potential modern slavery risks, which can be complex and deeply embedded within supply chains.

Looking ahead, extending modern slavery training across the broader S&SE leadership team is a strategic focus. By equipping leaders with the knowledge to identify and address these risks during supplier visits, we foster a culture of vigilance and responsibility. This initiative will lead to more informed decision-making and stronger supplier relationships, contributing to a more ethical and resilient supply chain.

We recognise that modern slavery risks may be inherent in all aspects of business. Collaborating closely with our suppliers, we are developing a robust risk management model for key direct and sub-tier suppliers to improve oversight, visibility, and understanding of potential risks. This model categorises the likelihood and impact of modern slavery risks, creating a focused program to mitigate risk and ensure our business does not negatively affect working conditions throughout our supply chain. ”

Aristocrat Sourcing & Supplier Excellence Team

“ We share Aristocrat's commitment to ethical practices and transparency. Preventing modern slavery and human trafficking is a core part of our global Human Rights Policy and Code of Conduct. Partnering with Aristocrat allows us to uphold our shared value of Good Business, Good Citizen. Together, we strive to create a responsible, transparent, and sustainable supply chain that respects human rights and promotes integrity across all operations.” ”

Aristocrat supplier audited in FY25





b. Additional updates in this reporting period

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

i. Policies, Procedures and other Documents

Anti-Modern Slavery Policy

Our Anti-Modern Slavery Policies were reviewed, updated and consolidated into one global policy that applies across the Group.

M&A Due Diligence Process

During the reporting period, members of the Working Group participated in the due diligence phase of potential acquisitions considered by the Group, with a focus on helping to identify potential risk factors associated with any proposed acquisition, including through entering new geographies. As part of this due diligence, we generally conduct a high-level review of a target’s operating jurisdictions, its supply chain and existing practices and procedures to identify and address risks of modern slavery in its operations and supply chain. This enables us to:

- Identify potential 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.

Where acquisitions proceed to close, integration plans are developed to incorporate the target and its workforce into standard Aristocrat policies and processes.

ii. Additional Supplier Due Diligence

Supplier Code of Conduct

In this reporting period, we refreshed our Supplier Code of Conduct, a milestone in our continuous improvement journey toward more ethical and responsible sourcing. This involved carrying out an in-depth, cross-functional review of our Supplier Code of Conduct, which involved stakeholders from across the business (including, Sustainability, Privacy, S&SE, Legal, Health Safety & Environment, P&C and others).

As part of our refreshed Supplier Code of Conduct, we have strengthened expectations around labour standards, with a particular focus on the prevention of modern slavery. We categorically prohibit all forms of modern slavery, including forced, bonded, or indentured labour. Suppliers are expected to ensure fair and ethical recruitment practices, including the prohibition of worker-paid recruitment fees, and to uphold the rights of workers such as freedom of movement, freedom of association, and the right to collective bargaining. In addition, suppliers must provide safe and healthy working conditions supported by robust incident management and emergency preparedness protocols. We require the implementation of effective management systems to identify, assess, and mitigate risks related to labour rights within supplier operations and their sub-tier supply chains.

These enhanced standards reflect our core value of Good Business, Good Citizen and our belief that ethical partnerships are foundational to sustainable success. Aristocrat remains committed to working collaboratively with suppliers to build transparent, responsible, and resilient supply chains that respect human dignity and promote social equity.



iii. Grievance and complaint mechanisms

Global Whistleblower Policy

During the year, Aristocrat’s Global Whistleblower Policy was updated to incorporate jurisdiction-specific enhancements reflecting changes in local whistleblowing laws across key operating regions.

We proactively shared country-specific EthicsPoint hotline numbers and our secure online reporting portal with Key Direct Suppliers that were engaged through our onsite audit efforts. This initiative was executed through targeted communications that reinforced the importance of transparency and ethical conduct. Suppliers were encouraged to disseminate this information to their employees and workers, enabling direct access to confidential reporting channels for any grievances, including those related to modern slavery. By embedding these resources into our supplier engagement process, we have strengthened our ability to detect and respond to potential risks, while fostering a culture of accountability and trust throughout our global supply network.

iv. Training

Tailored training

In the last financial year, Aristocrat successfully implemented tailored training for our S&SE leaders to strengthen their ability to identify potential modern slavery risks during supplier visits. The training equipped our teams with practical tools and awareness strategies to recognise indicators of forced labour, exploitative practices, and other human rights concerns. By embedding this training into our supplier engagement framework, we have enhanced our frontline capacity to proactively detect and address modern slavery risks.

Following positive feedback and engagement from stakeholders, this tailored training was also rolled out to other teams that may be directly involved in assessing or addressing modern slavery risks in our business, including legal, logistics and sustainability.

“I recently attended a Modern Slavery Awareness training, which provided valuable insights into identifying risks, understanding compliance requirements, and promoting ethical practices within global supply chains. This training reinforces my commitment to ensuring transparency and human rights in all aspects of our global logistics operations.”

“It was incredibly informative, and I look forward to hearing more on the subject.”

“I’m very passionate about this topic and will support this in any way myself and the rest of Indirect Sourcing can.”

General training

In this reporting period, we commenced a review of the general modern slavery prevention training (which all Aristocrat employees are required to complete) to ensure it is up-to-date and relevant. We intend to complete this review and launch the updated training in FY26.



3. The Group's approach to remediation

Aristocrat is firmly opposed to all forms of modern slavery. We work to identify and address associated risks across our global operations and supply chain in line with our values, obligations and stakeholder expectations. We recognise the complexity of these global issues and embrace our responsibility to drive continuous improvement.

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, UK and Canadian governments and the UNGPs. The four key principles are:

- **Victim-centred approach:** 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;
- **Prevention and redress:** remediation actions should be designed to prevent ongoing harm, and to provide redress for past harm;
- **Collaboration:** wherever possible, remediation actions should be collaborative and will be most effective when developed in collaboration with our suppliers; and
- **Continuous improvement:** 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 our Incident Response Guide, which provides guidance on responses to actual or suspected modern slavery incidents. This Guide informs 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 recognise the importance of remediation and have in place clear processes and actions to remediate modern slavery incidents. Through our scheduled onsite audits in this reporting period, we did not identify any potential indicators of modern slavery. Refer to [Section IV\(B\)\(2\)\(a\)](#) for further details.

We intend to review our Incident Response Guide and related grievance mechanisms in FY26 to ensure they are aligned with updated regulatory guidance and best practice.

4. Measures taken to remediate

While the Group did not identify any specific incidents of modern slavery in our operations or supply chain in FY25, we plan to continue ongoing communication and collaboration with key suppliers and sub-tier suppliers to seek further improvements designed to prevent ongoing harm, and to provide redress for any past harm. As part of this, we will utilise the Supplier Modern Slavery Program Maturity Rating we developed in this reporting period (see [Section IV\(B\)\(2\)\(a\)](#)) to focus our efforts on suppliers that have less developed modern slavery compliance programs.

No measures were required to be taken in FY25 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.

In FY25, we continued our commitment to monitor and improve labour practices across our supply chain. As part of this process, we followed up with the suppliers identified in the previous reporting period to confirm and validate that they are meeting the improvement commitments agreed upon in their improvement plans. We remain committed to conducting these follow-ups annually and to maintain a proactive approach to supplier engagement. This includes reviewing previously assessed suppliers to ensure sustained compliance. Our audits confirmed the improvements implemented by these suppliers remain in place and effective, and we will continue to monitor progress through regular engagements to mitigate risks and uphold our standards.

Case studies: remediation actions

As noted in [Section IV\(B\)\(2\)\(a\)](#), we continued to engage with the suppliers that we audited in the previous reporting period to monitor the implementation of agreed remediation actions.

In response to an audit finding relating to potentially restrictive contract terms and dormitory conditions for migrant workers, we worked with the supplier to take a range of measures including to remove the restrictive contract terms from the migrant workers' employment contracts and requesting that any legitimate dormitory conditions applied to all workers (both local and migrant workers).

In another instance, to address potential restrictions on worker freedom of movement in supplier-provided accommodation, we worked with the supplier to implement an agreed remediation plan which included the following actions: (1) the supplier providing migrant workers information on their accommodation options in their preferred language and providing this to the workers prior to onboarding and arrival to allow the workers to make an independent decision on the most suitable accommodation option for them; and (2) updating dormitory regulations and procedures for off-site accommodation applications.



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

Our anti-modern slavery program is designed to identify and address the many forms of modern slavery and to facilitate appropriate action through a robust due diligence process and risk management framework. The program supports our ambition to maintain sustainable business operations, conducted ethically and in compliance with applicable laws, in which all workers throughout our operations and supply chains are treated with respect and dignity. We believe that the combination of preventative, detective and corrective mitigants covered in [Section IV](#) is effective at assessing and addressing our risk.

Consistent with previous reporting periods, in FY25, the Working Group, in consultation with relevant stakeholders (as set out in [Section IV](#)), assessed the effectiveness of Aristocrat’s approach to mitigating modern slavery risks. This approach is measured against the Key Performance Indicators (**KPIs**) below. The effectiveness of our actions continues to be assessed annually against these KPIs.

Key Objective Category	Performance Indicator Definition	Summary of performance FY25
Employee training and awareness	The percentage of Group employees, who have successfully completed modern slavery training	
Consistent application of the Supplier Code of Conduct and the ethical sourcing contractual safeguards	The percentage of the Group’s Key Direct Suppliers and Sub-Tier Suppliers that are signatories to the ethical sourcing contractual safeguards or otherwise subject to the Supplier Code of Conduct.	
Audits of our Key Suppliers	Onsite audits or supplier visits of key suppliers to identify & mitigate potential modern slavery risks.	<p>Fifteen key supplier audits were carried out in FY25.</p> <p>For further details, see Section IV(B)(2)(a).</p>
Prompt investigation and remediation of reported modern slavery incidents	The percentage of investigations and required remediation for modern slavery incidents that comply with our Incident Response Guide.	The Group did not identify any specific incidents of modern slavery in our operations or supply chains in FY25.



Anchored on the value of “Good Business, Good Citizen”, our responsible sourcing model is based on three pillars – Anti-Modern Slavery, Supplier Sustainability and Supplier Diversity. These pillars are supported by a robust risk management framework, structured governance processes, and regular audits to ensure accountability and transparency across our supply chain. The model reflects our ambition to build a resilient supply chain that contributes positively to our global operations and stakeholder communities. We maintain active, two-way communication with our suppliers through email engagement, Supplier Business Reviews, surveys, and collaborative meetings. These touchpoints aim to drive continuous improvement and enable us to share strategic priorities, assess performance, and co-develop improvement plans that drive meaningful change.

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. Understanding the views of our stakeholders is critical to the effectiveness of our program. We regularly engage with a broad range of stakeholders, including investors, analysts, employees and suppliers via a range of face-to-face and virtual meetings, events and surveys. 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.

Astracrat continues to periodically review the KPIs listed above to determine whether they continue to represent appropriate criteria for measuring the effectiveness of Astracrat’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 other bodies as part of our approach.

“We are committed to conducting business with the highest standards of ethics, transparency, and respect for human rights. We recognise that modern slavery remains a pervasive global issue, particularly within complex supply chains. In alignment with international standards, local labour law, and Astracrat’s expectations, we have implemented policies, actions, and ongoing initiatives to prevent modern slavery in our operations and across our supply chain. Through collaboration with Astracrat, we strive to uphold accountability, strengthen due diligence, and foster a culture of continuous improvement to protect human rights at every level of business.”

Astracrat supplier audited in FY25





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 Product Madness and Aristocrat Interactive, recognising that the risk profile of Product Madness and Aristocrat Interactive 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 Product Madness and Aristocrat Interactive, especially in relation to managing supply chain risk.
- Collaboration with the M&A team on pre-acquisition due diligence.
- Supporting our hardware suppliers to assess and address risk.

In FY25, 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:

- Detailed summary of the process and outcome of our on-site supplier audits, including details of continued engagement with previously audited suppliers on implementation of remediation actions.
- Quotes from our staff and suppliers highlighting the impact of our training and supplier engagement.
- Case studies on the remediation actions some of our suppliers have implemented.

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, key developments and regulatory reviews

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, the Australian Government's response to the review and the further ongoing consultation. We recognise that the Australian Government agrees in full, in part, or in principle, to 25 of the 30 recommendations made in the review.

We have also been keeping up to date with other developments in the anti-modern slavery landscape and are considering how these impact our anti-modern slavery compliance program. These developments include:

- The Australian Government's review and response to the recommendations tabled in the Report of the statutory review of the Modern Slavery Act 2018 (Cth) to reform the Australian Modern Slavery Act;
- Other major developments in this space, including the publication of updated guidance by the UK Government relating to the UK Modern Slavery Act; and,
- The appointment of Australia's first federal Anti-Slavery Commissioner, Mr Chris Evans, and the subsequent release of significant resources and materials from the Commissioner.

We welcome the appointment of the first federal Anti-Slavery Commissioner. Our future actions and reporting periods will be informed by the outcome of these ongoing regulatory reforms and developments.

We also regularly monitor developments in modern slavery laws globally and acknowledge the joint publication by the Australian, UK and Canadian Governments of the optional reporting template and guidance for entities that report under modern slavery laws in multiple jurisdictions. We will consider the optional reporting template for future reporting periods in line with best practice.



C. Relevant matters impacting our business

1. Ukraine and Middle East conflicts

The impact of the ongoing conflicts in Ukraine and the Middle East on employees continues to be identified as a risk area due to the correlation between conflict and the associated vulnerability exposure of civilian populations to modern slavery.

At the beginning of 2025, Aristocrat had approximately 1500 people in the affected regions, across Aristocrat Interactive, Plarium and Product Madness, and around 560 remained after the divestment of Plarium in February 2025. The Group currently has offices in Lviv, Kyiv and Tel-Aviv, with other employees working remotely in other locations in Ukraine and Israel.

Aristocrat has taken steps to assist impacted employees and their families to cope and manage the conflicts and continues to offer support as needed.

While the situation in both regions 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, while also ensuring the safety and wellbeing of employees.

D. Looking ahead - Our future roadmap

We remain committed to proactively managing modern slavery risks across global operations and supply chain. Building on the progress made last year, this year's strategic roadmap focuses on strengthening internal capabilities, enhancing supplier oversight, and deepening community engagement. These actions are designed to address evolving risk profiles and regulatory expectations while reinforcing our values of integrity, transparency, and accountability. 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 risks in Section IV, we may consider the following actions for the future roadmaps:

Our Employees



- Deliver supplemental modern slavery training to key personnel responsible for responding to whistleblower complaints.
- Review and refresh the general modern slavery training module for all employees to ensure continued relevance and effectiveness.

Our Business Leaders



- Continue tailored training for new Sourcing & Supplier Excellence team members to support modern slavery risk identification during supplier visits and audits.
- Review and update Incident Response Guide and related grievance mechanisms to align with evolving best practice.

Our Supply Chains



- Continue onsite audits of our suppliers in a risk-based manner and continue to work with suppliers on the monitoring and implementation of existing improvement action plans.
- Continue to map and assess the supply chain(s) for Aristocrat Interactive to identify key suppliers and potential modern slavery risks.
- Broaden our Modern Slavery Supplier Self Assessment Questionnaire scope to include indirect strategic suppliers to assess their anti-modern slavery program maturity and identify emerging risks.
- Onboard a third-party platform to enhance third-party validation, benchmarking, and centralised audit documentation.

Our Community



- Continue maturing our modern slavery audit capabilities by engaging external subject matter experts and delivering robust training for audit leaders.
- Explore opportunities to support community organisations aligned with our values and committed to addressing modern slavery and human rights.



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
Page 3	A statement must identify the reporting entity (section 16(1)(a))		
Section I (Who we are: our structure and business) and Section II (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))
Section IV (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: <ul style="list-style-type: none"> (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 V (Assessing the effectiveness of our actions) and remediation processes)	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))



Section in Modern Slavery Statement	Australian Modern Slavery Act	UK Modern Slavery Act	Canadian Modern Slavery Act
<p>Section VI (Our consultation process)</p>	<p>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))</p>		
<p>Section VII (Other important information)</p>	<p>A statement must include any other information that the reporting entity, or the entity giving the statement, considers relevant (section 16(1)(g))</p>		
<p>Section IX (Approval and signing)</p>	<p>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))</p>	<p>For bodies corporate, a statement must be approved by the board of directors and signed by a director (section 54(6)(a))</p>	<p>The statement must be approved by the organisation’s governing body.</p> <p>The statement must include:</p> <ul style="list-style-type: none"> • 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, Aristocrat Global Holdings Pty Ltd, Aristocrat Technology Gaming Systems Pty Limited and Aristocrat Technical Services Pty Limited was approved by the Board of Aristocrat Leisure Limited as the parent entity on 18 February 2026, 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:

Neil Chatfield

Signature

Neil Chatfield
Chairman

18 February 2026
Date

Trevor Croker

Signature

Trevor Croker
CEO & Managing Director

18 February 2026
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 2026, and the Board has authorised Matthieu Labbat, a director of the board, to sign this Modern Slavery Statement on behalf of Product Madness (UK) Limited:

Matthieu Labbat

Signature

Matthieu Labbat
Senior Vice President, Head of Product Madness

25 March 2026
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 [insert date], 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:

Craig Toner

Signature

Craig Toner
CEO Aristocrat Gaming

25 March 2026
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 2026, 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 period ended 30 September 2025.

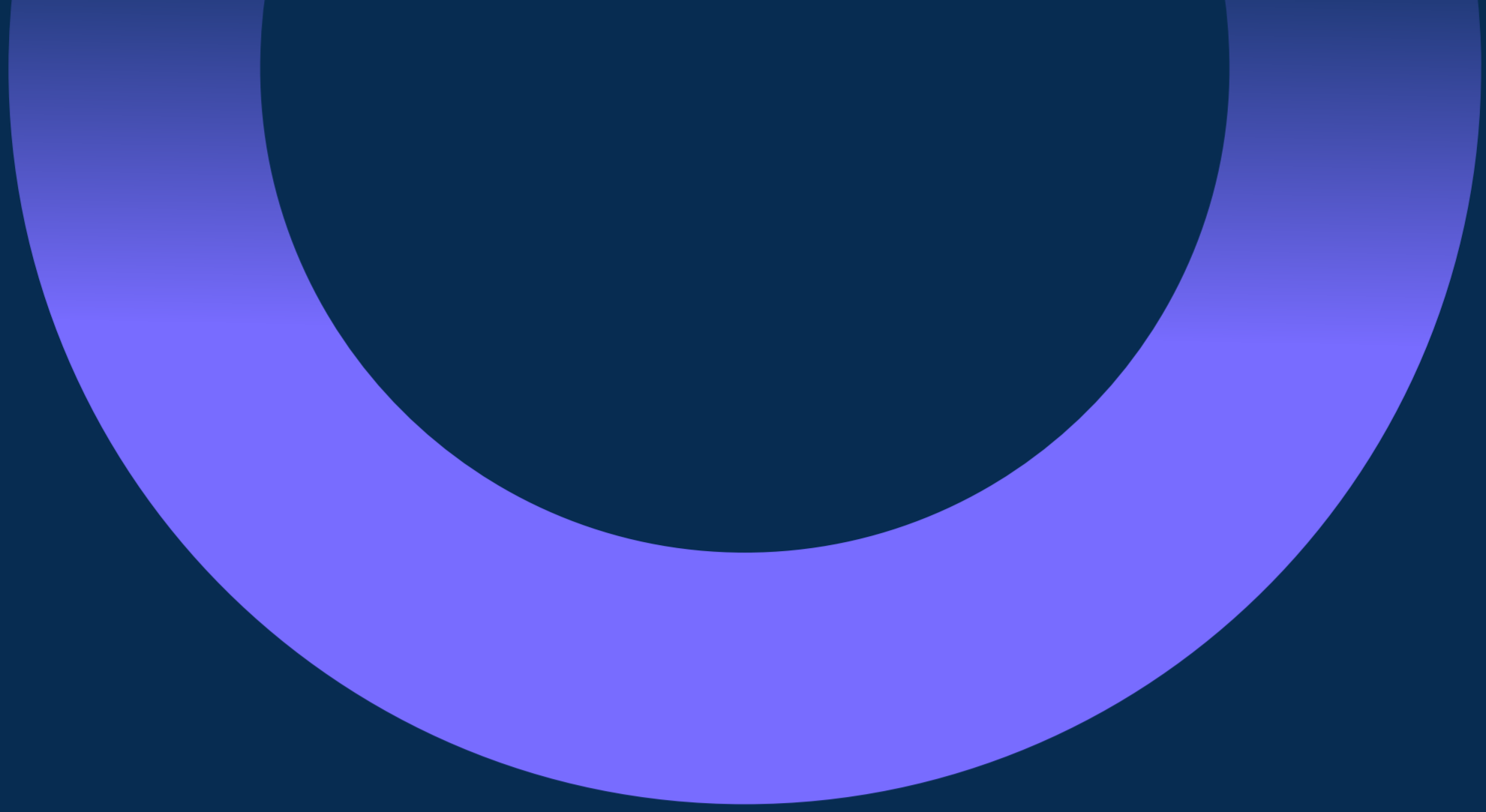
I have authority to bind Aristocrat Technologies Canada, Inc.

Craig Toner

Signature

Craig Toner
CEO Aristocrat Gaming

25 March 2026
Date



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