



ARISTOCRAT

# Modern Slavery Statement 2024



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)

**Legislation:** Modern Slavery Act 2018 (Cth) (**Australian Modern Slavery Act**)  
**Reporting Year:** 5  
**Reporting Period:** 1 October 2023 – 30 September 2024 (**FY24**)  
**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:** 4  
**Reporting Period:** FY24  
**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:** 8  
**Reporting Period:** FY24  
**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 FY24, 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:** 2  
**Reporting Period:** FY24  
**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.

Information provided in this Statement is provided for the reporting period 1 October 2023 - 30 September 2024 and is current as at 30 September 2024 unless otherwise indicated.



# Foreword from The Chairman and CEO

Across Aristocrat's global enterprise, we are guided by our core value of 'Good Business, Good Citizen.' We express this in many ways, including 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 Aristocrat took across our 2024 financial year (FY24) to improve our Anti-Modern Slavery Program. This is the fifth annual Modern Slavery Statement we are publishing under the Australian Modern Slavery Act, and our second 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 FY24, while also outlining key additional measures implemented during the reporting period.

Among other highlights, we continued to enhance our internal modern slavery risk management model in FY24. We focused our efforts on a more fulsome understanding of the risks within our broader supply chain through on-site compliance checks and supplier audits, among other initiatives. Aristocrat partnered with third party anti-modern slavery experts to develop a tailored audit methodology and assessment criteria for conducting on-site audits, bringing a best practice lens to our efforts.

Aristocrat engaged with suppliers to resolve identified modern slavery risk observations and implement mutually agreed remediation improvement plans. In some instances, third party experts helped conduct on-site audits and worked with Aristocrat and our key suppliers on collaborative improvement plans. We will continue a program of supplier risk assessments to support identification and remediation of modern slavery risk observations identified within our supply chain.

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.

Finally, we wish to acknowledge and thank our dedicated Anti-Modern Slavery Working Group, and all Aristocrat people who contributed to our progress over 2024, for their energy and commitment 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.

**“ In FY24, we continued to enhance our internal Modern Slavery risk management model and focused our efforts on better understanding the risks within our broader supply chain which includes sub-tier suppliers, and on-site compliance checks and supplier audits ”**



**Neil Chatfield**  
Chairman



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



# I. Who we are:

## Our structure and business

### A. Our structure

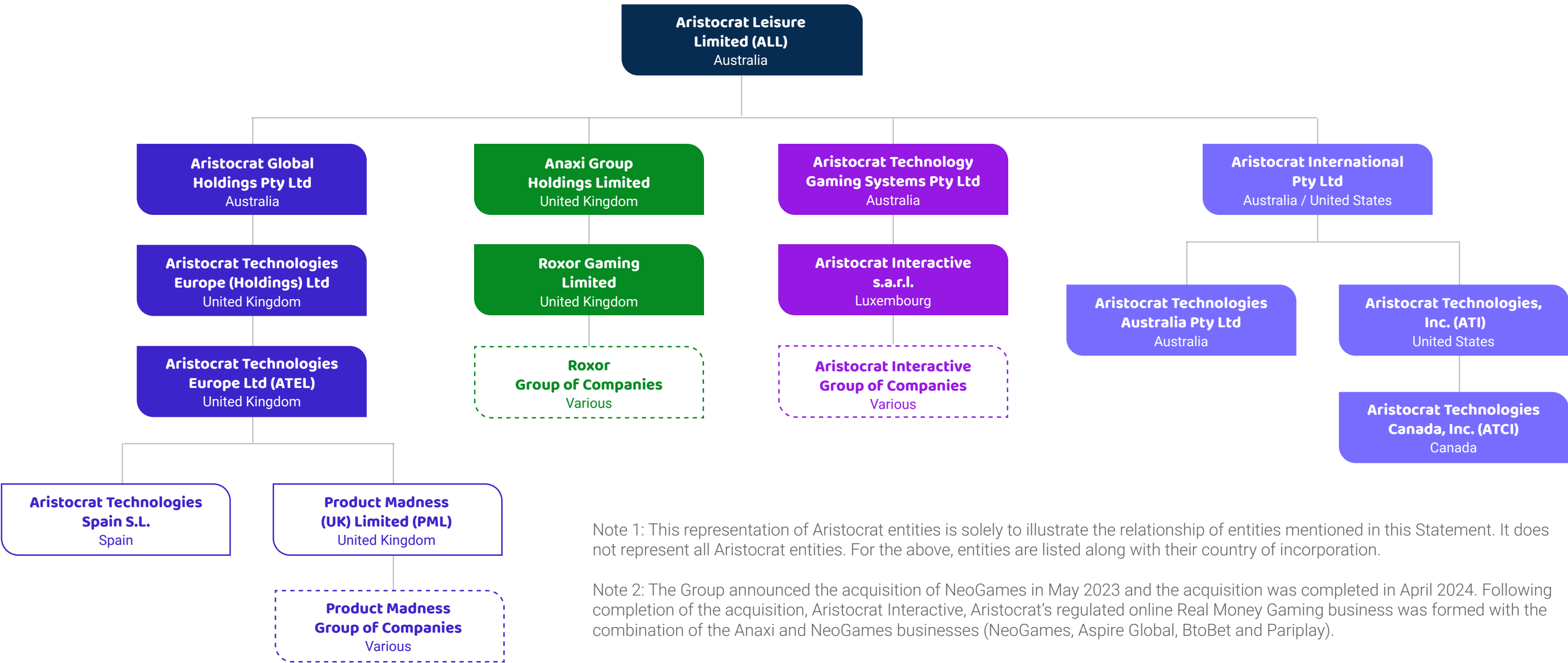
ALL is the parent company for the Aristocrat Group. It is incorporated in New South Wales, Australia and is listed on the ASX (ASX: ALL). Each Aristocrat Australian Reporting Entity (other than ALL):

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

Several of Aristocrat’s Australian Reporting Entities own or control a number of subsidiaries or branches which also form part of the Group.

In this Modern Slavery Statement, we refer collectively to ALL and its global subsidiaries, including the Aristocrat Australian Reporting Entities, the Aristocrat UK Reporting Entities and the Aristocrat Canadian Reporting Entities as the **Group, Aristocrat (where applicable), us, our or we**.

Not all entities in the Group have reporting obligations. However, because we take an enterprise-wide approach to what we do, all entities in the Group comply with relevant policies and procedures in this space (with limited exceptions, as noted in this Statement). All numbers in this report are accurate at the time of writing and may include rounding or approximations.

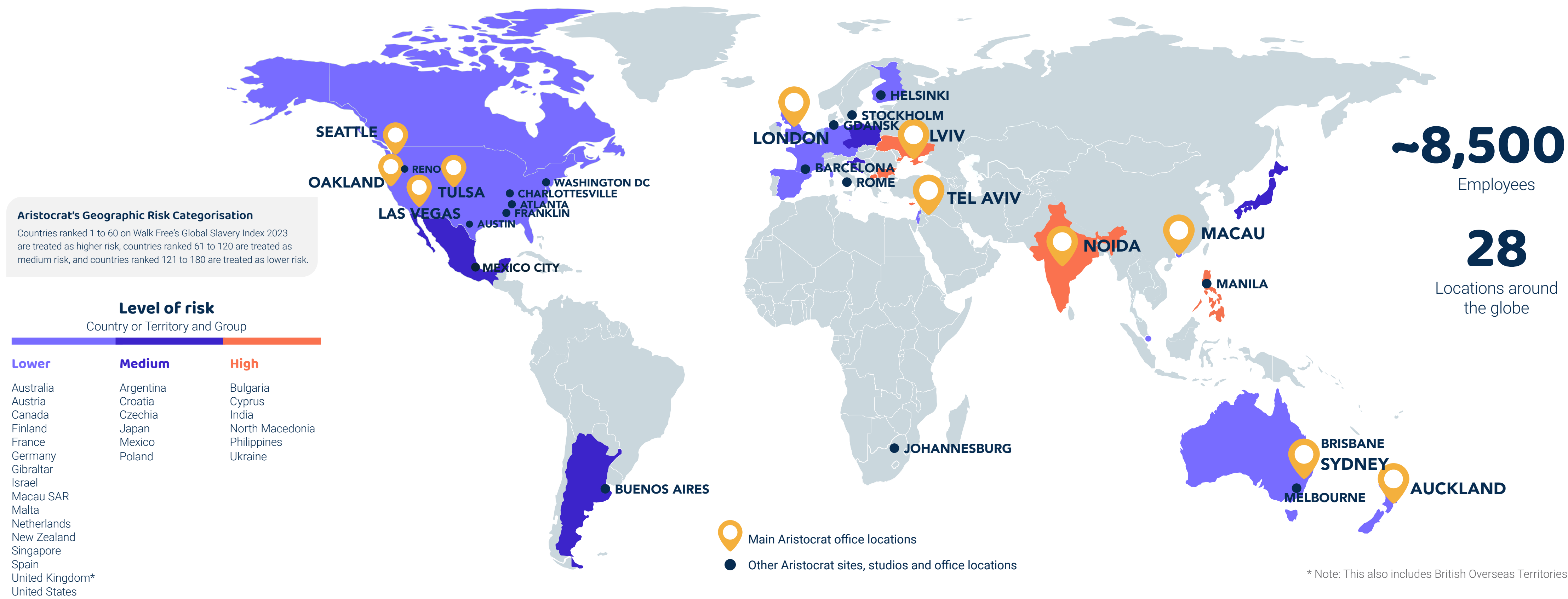




B. Our business

ALL is a global entertainment and gaming content creation company powered by technology. Aristocrat’s three reporting segments span regulated land-based gaming (Aristocrat Gaming), mobile games publishing (Pixel United) and regulated online Real Money Gaming (Aristocrat Interactive). Aristocrat offers a diverse range of products and services including electronic gaming machines (EGMs), casino management systems, free-to-play mobile games and online real money games, including iLottery, that serve customers and entertain millions of players worldwide every day. Our team of around 8,500 people across the globe are 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, and to lead 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.





## B. Our business

Aristocrat Gaming is the leading designer, manufacturer and distributor of regulated land-based slot games across the globe. From award-winning games and hardware to unique game mechanics and leading performance, Aristocrat Gaming delivers end-to-end solutions to customers in more than 300 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 Latin American (**LATAM**)), Europe, Middle East and Africa (**EMEA**), Asia Pacific (**APAC**), Australia and New Zealand. In North America, the business also derives recurring revenue through its gaming operations. Further, Aristocrat Gaming has distribution arrangements in the Americas (including North America and 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.

Pixel United is Aristocrat’s free-to-play, mobile-first games business. Pixel United comprises three operating businesses: Product Madness, Plarium<sup>1</sup> and Big Fish Games along with a number of studios located around the globe. The businesses span multiple key genres and have a strong focus on responsible gameplay. Pixel United leverages Aristocrat’s recognisable game brands together with its in-house development, marketing capabilities and best-in-class Live Ops, to entertain millions of players across the globe each day.

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

## C. Our group-wide approach to modern slavery compliance

While the Group is large, diverse and global, Aristocrat is committed to developing, maintaining, and continually improving a robust, enterprise-wide approach and response to modern slavery.

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



1. On 12 November 2024, Aristocrat announced that its subsidiary, Pixel United Holdings Limited, had entered into a binding agreement for the sale of Plarium. The transaction completed on 13 February 2025. At the same time, Aristocrat announced that effective from the Group’s first half results reporting (for the six months to 31 March 2025) Product Madness will replace the Pixel United reporting segment, and will include results from both Product Madness and Big Fish Games.



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

## A. Our operations

### 1. Aristocrat Gaming Australia

ALL, Aristocrat International Pty Ltd, and Aristocrat Global Holdings Pty Ltd, which comprise three out of the five 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 FY24, ATA had approximately 1000 workers. About 95 per cent were full-time or part-time permanent employees**, and the remainder were contingent workers, including temporary, agency or contracted workers. The other Aristocrat Australian Reporting Entities did not employ any workers.

### 2. Aristocrat Gaming EMEA

Aristocrat Technologies Europe Limited (**ATEL**) 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<sup>2</sup>.**

ATEL 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 Pixel United or Aristocrat Interactive.

**In FY24, ATEL and ATSS had approximately 100 workers. Almost 99 per cent of these workers were full-time or part-time permanent employees;** the remaining workers were contingent workers, including temporary, agency or contracted workers. In the same period, almost 90 per cent of the permanent and contingent workers of ATEL and ATSS were based in the UK, Austria and Spain.

### 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 FY24, ATCI had approximately 30 workers based in Canada, the majority of which were full-time or part-time permanent employees.**

### 4. Pixel United

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 the Pixel United business unit.

**PML's principal activities are to provide development, operational and support services in respect of free to play, social and casual games which**

**are published by related entities**, Product Madness, Inc. and Big Fish Games, Inc., which are both companies 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.<sup>3</sup> **In FY24, PML and its subsidiaries had approximately 620 workers. Approximately 92 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 43 per cent of the permanent and contingent workers of PML and its subsidiaries were based in the UK.**

### 5. Aristocrat Interactive

Aristocrat Technology Gaming Systems Pty Ltd (**ATGS**) is a holding company only and does not carry out operations itself. ATGS was 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, 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 Gaming Systems.**

Aristocrat Interactive's activities are supported by group companies located in Israel, the UK, Malta, Gibraltar, Ukraine, Spain, North Macedonia, Bulgaria, Czechia and the USA.

Following completion of the acquisition of NeoGames during the reporting period, **work has commenced to integrate the NeoGames entities into our anti-modern slavery program**, and this integration will continue in the next reporting period and beyond.

<sup>2</sup> Following the closure of our UK integration facility in May 2023, many operations (including integration) have moved to Spain under ATSS.  
<sup>3</sup> PML may have a limited number (fewer than 10 in each of the following countries) of permanent and contingent workforce residing in countries which include Brazil, Lithuania, Poland, Spain and Ukraine.

## B. Charitable donations

Aristocrat is committed to driving positive impact and inspiring change in the communities where we live and work. Our giving program, Aristocrat Cares, is guided by our core values and supported by committed employees and strategic corporate giving initiatives. We aim to have impact on both a local and global scale, and the program supports employee volunteering and fundraising events and awards and grants to impactful non-profit organisations. The Group will continue to assess current and future charitable opportunities that relate to potential modern slavery victims. For more information and details of our community contribution in FY24, please visit [www.aristocrat.com/sustainability](http://www.aristocrat.com/sustainability).



## C. Our supply chains

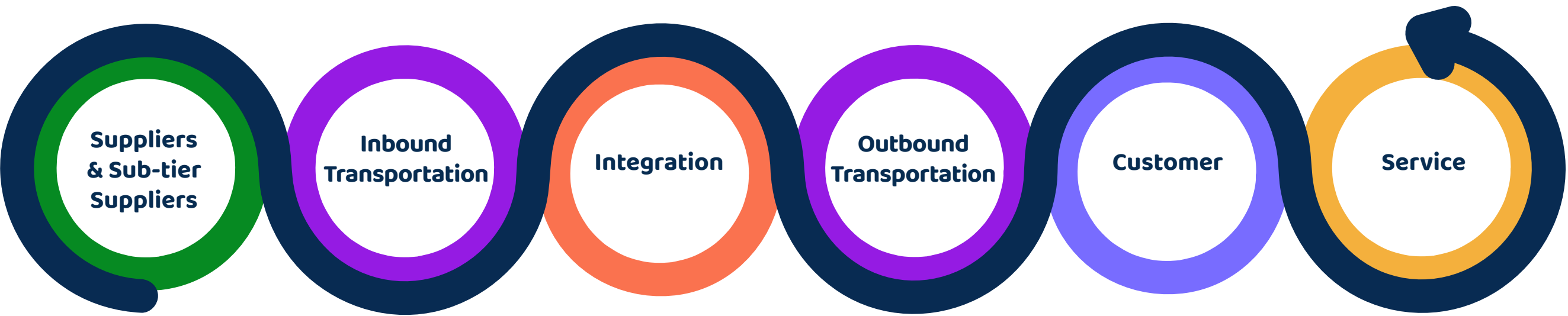
Aristocrat’s supply chain is large, global and complex. Given the diverse nature of our businesses, the Group has several supply chains that support the delivery of value to our customers. The supply chains have differing levels of modern slavery risk (as discussed in [Potential Risks in our Supply Chain](#)).

### 1. Hardware supply chain

The hardware supply chain 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 96 percent of our spend for the hardware supply chain was attributed to 41 key direct suppliers and 13 managed sub-tier suppliers (**Key Direct Suppliers and Sub-Tier Suppliers**). The 13 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.

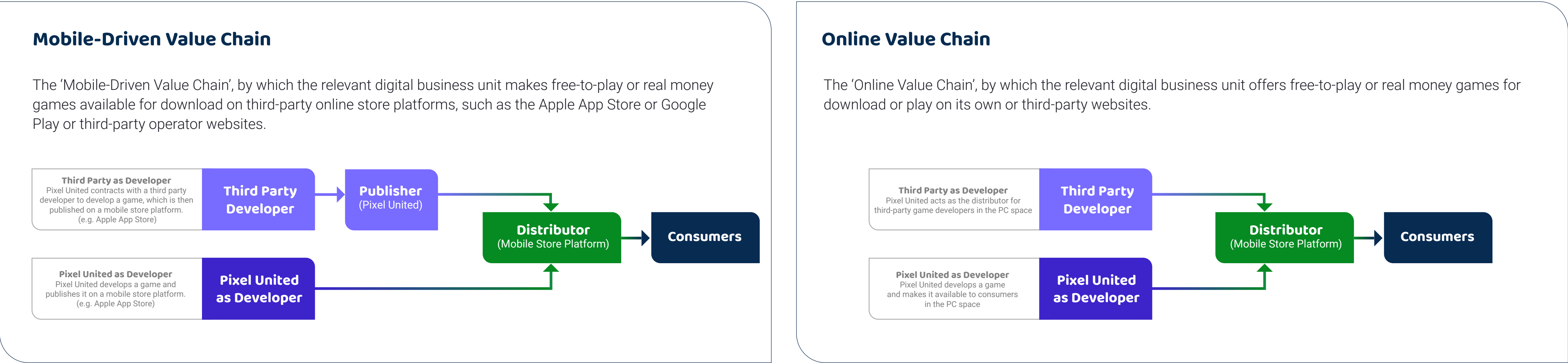
Hardware Supply Chain





## 2. Digital supply chain

In this reporting period, approximately 24 percent of our spend for the digital supply chain was attributed to approximately 60 direct suppliers. The digital businesses, which include Pixel United and parts of the 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](#).



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

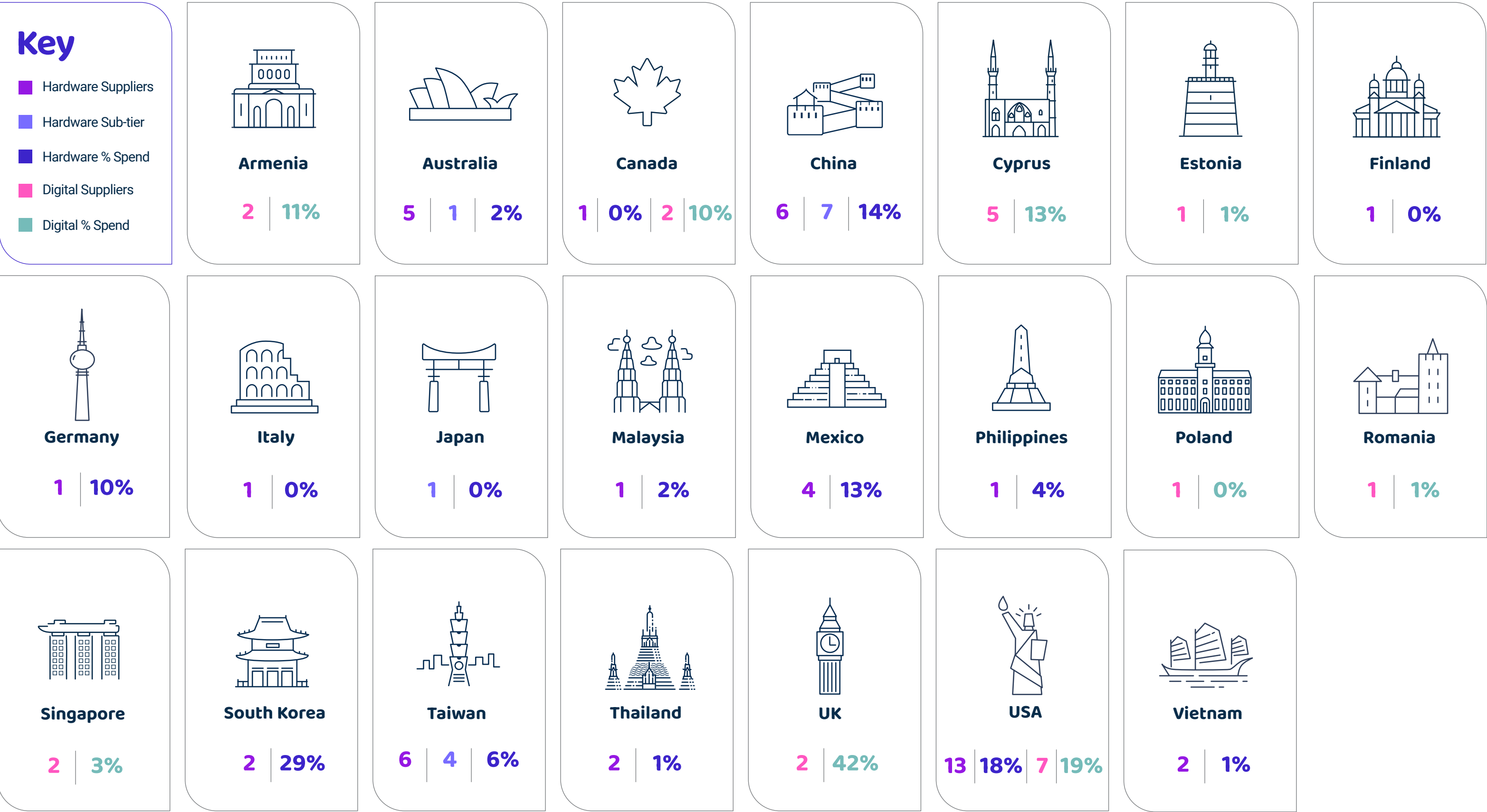
Based on our early integration work following the acquisition of NeoGames, which has included consideration of NeoGames' operating jurisdictions, our preliminary understanding based on high-level risk mapping of NeoGames is that the Aristocrat Interactive business faces similar modern slavery risks in its operations as our Pixel United business, albeit with people and operations in some jurisdictions with a higher risk of modern slavery practices. Due to the timing of the NeoGames acquisition and consolidation of the Aristocrat Interactive business unit, we have not had sufficient time in this reporting period to investigate and map the supply chains for Aristocrat Interactive. However, this will be one of our focus areas for the next reporting period.

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

### 4. Location of suppliers

Our supply chain consists of approximately **82 key direct suppliers and sub-tier suppliers across 22 countries**. In this Statement, we have aggregated the data from our hardware and digital supply chains across the Group to show an improved view of our full direct supply chain by country.

Note: 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 1: this also includes British Overseas Territories  
\*\* Note 2: the locations shown for hardware suppliers are manufacturing locations and some suppliers may manufacture in more than one location.  
\*\*\* Note 3: Spend for Canada, Finland and Italy is less than 1% and only shows up if we reflect 3 place decimals

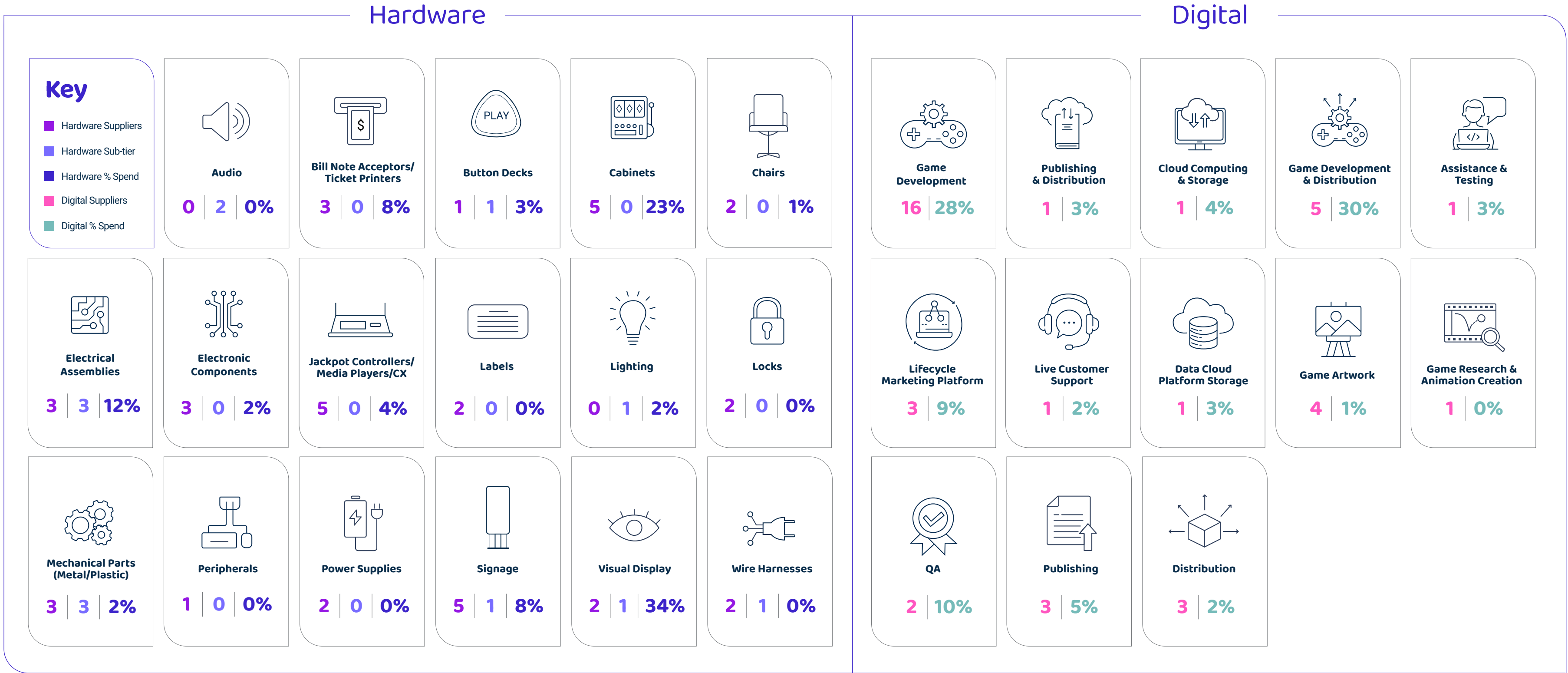


5. Product and service categories

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

Note: 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.

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



\* Note: Spend for Labels, Locks, Peripherals, Power Supplies and Game Research & Animation Creation is less than 1% and only shows up if we reflect 3 place decimals

6. Indirect sourcing

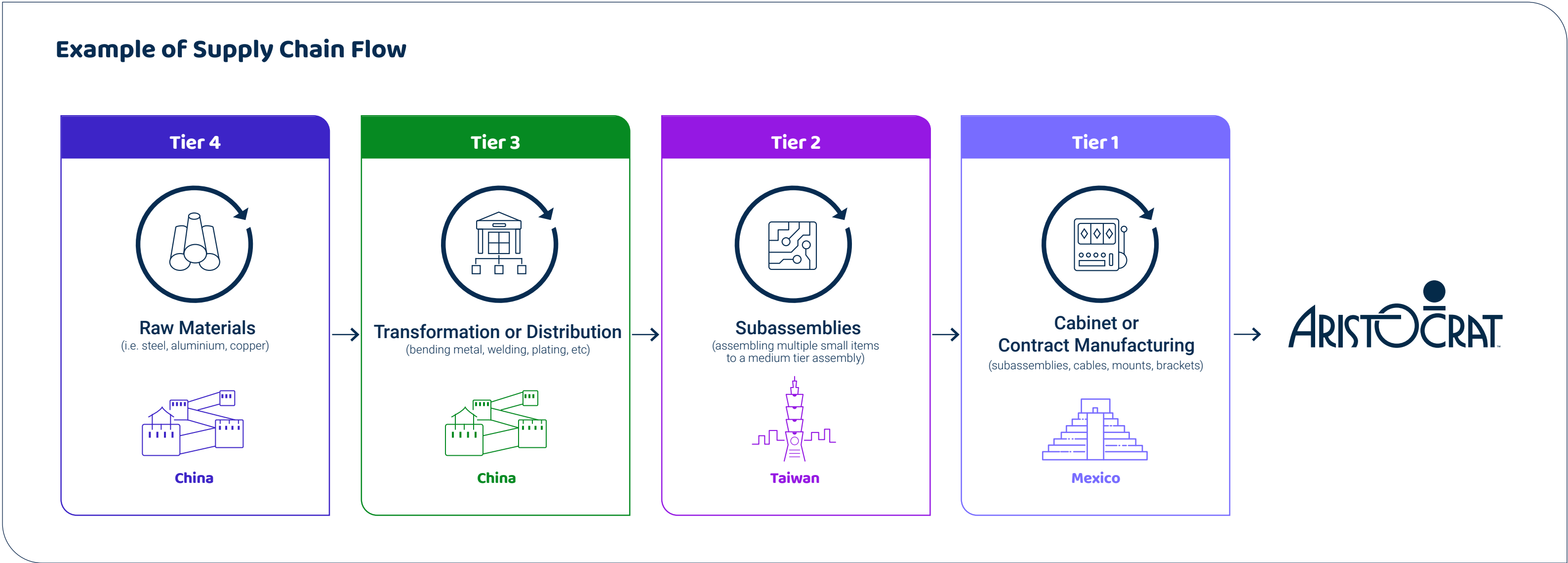
To support Aristocrat Gaming, Pixel United and Aristocrat Interactive, the Group engages a range of other suppliers who supply goods or services that are not integrated or used in our gaming products nor in relation to mobile game development. These are suppliers from whom we purchase goods or services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

7. Understanding our supply chain

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

a. Multi-tiered supply chain

To enhance visibility into our supply chain and address both holistic risk and modern slavery compliance, we implemented a software solution that maps our sub-tier network. By partnering with key hardware suppliers to gather geographic data on their suppliers (Aristocrat’s tier two suppliers) and expanding this mapping to tier three and beyond, we gain a comprehensive view of our supply chain. This program provides complete visibility into our supply chain, supporting responsible sourcing and ethical standards across multiple tiers.





### b. Gaming regulations and technical requirements

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

### c. Level of influence with suppliers

Aristocrat has more influence regarding modern slavery awareness, identification, and risk mitigations with our hardware suppliers and sub-tier suppliers than our indirect or digital suppliers. This level of influence can be attributed to many factors, including the supplier's size or scale, our partnership history, contractual agreements, and the level of spend with these suppliers.

Across our supply chain, we engage with suppliers ranging from small local businesses to large multinational corporations. Many of the larger companies may have modern slavery risk structures already in place. Where possible, Aristocrat aims to support any of our suppliers to uplift their anti-modern slavery programs covering awareness, risk identification and mitigations. For example, upon request by hardware suppliers, the 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 Group examines three key indicators to identifying modern slavery risks in our operations and supply chain:



### Industry, sector and product risk indicators:

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



### Geographic risk indicators:

We consider the risk that some countries in which we operate are reported to have a higher prevalence of modern slavery compared to other countries. We continue to base these assessments on the Walk Free Global Slavery Index<sup>4</sup>, and have assigned risk ratings to our countries of operation based on that index.



### Working condition indicators:

Finally, we consider that the following may be indicators 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.



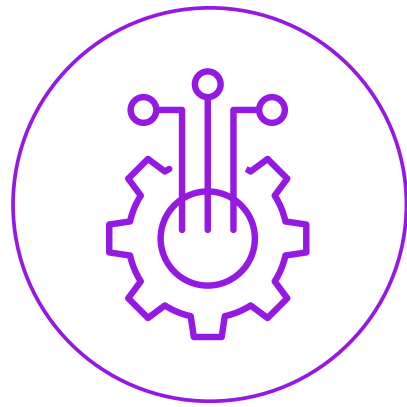
4. Walk Free’s 2023 Global Slavery Index can be found at <https://www.walkfree.org/global-slavery-index/map/>.



In the Sections below, we identify the risks of modern slavery practices, meaning the potential for the Group to cause or contribute to modern slavery through our operations, or to be directly linked to modern slavery through our supply chains, as these concepts are defined in the UN Guiding Principles on Business and Human Rights. Where we have used these terms below, they are italicised.

Summary of our modern slavery risks

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



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



Risks where Aristocrat could 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 and climate change may present increased risks in our operations and supply chain. Given that risk is not static, we will continue to regularly review our business and its external factors to consider the potential change to the risks identified as well as whether new risks should be added.

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 our supply chains and, specifically, our 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 actions (see [Section II\(C\)\(6\)](#)). Where possible, 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.

## 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**

Risk	Current Risk Status & Mitigations	Assessed Risk Change over Reporting Period	Projected Risk Change over Next Year	Projected Risk Change Rationale	Future Mitigations Under Consideration
<div><b>Working Condition</b></div> <div>Employment practices for direct/permanent workers may not be compliant with laws in applicable jurisdictions.</div> <div><b>Cause</b></div>	<p>Although we acknowledge that Aristocrat, as with all employers, could in theory cause this modern slavery risk, we consider the likelihood of this risk is mitigated due to the following measures in place:</p> <ul style="list-style-type: none"><li>Employee pay and benefits are governed by the Aristocrat Global Reward Policy that specifies median market pay for local and regional locations.</li><li>Within Australia and New Zealand, permanent and temporary employees are engaged through either individual contracts or under collective Enterprise Agreements. The Enterprise Agreements set out pay and conditions of employment. The certification process for these Agreements ensures employees are better off overall when compared to the relevant modern award.</li><li>For all other regions, we review our employment agreements and practices in consultation with our external lawyers, as necessary, to ensure we are compliant with all laws in the applicable jurisdictions.</li><li>For employees under individual contracts, we undertake regular reviews to benchmark pay benefits and employment conditions to ensure that employment terms are equal to or above the legislative minimums.</li></ul>	<p>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>While Aristocrat’s exposure to the conflicts in Ukraine and the Middle East increased with the acquisition of NeoGames, which has a presence in Israel and Ukraine, the Group has taken steps to ensure the safety, security and wellbeing of the affected employees (see Section VII(C)(2) for further details).</p>		<p>Aristocrat has taken significant steps to ensure the safety, security and wellbeing of its employees impacted by the conflicts in Ukraine and the Middle East.</p> <p>As a global company, we acknowledge 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.</p>	<p>This risk and its mitigations will continue to be reviewed as part of the standard People &amp; Culture processes and in line with the Group’s Business Resilience Framework.</p>
<div><b>Working Condition</b></div> <div>Employment practices for contractors/ temporary workers may not be compliant with laws in the applicable jurisdictions.</div> <div><b>Directly Linked</b><b>Contribute</b></div>	<p>There are times when we engage temporary workers directly or through an employer of record arrangement.<sup>5</sup> Where possible, we engage temporary workers and contractors directly (e.g., we will endeavour to set up an entity where there are 5 or more workers in one location).</p> <p>When directly engaging temporary workers and contractors, we have written agreements with these workers governing their engagement with Aristocrat, including:</p> <ul style="list-style-type: none"><li>Key terms provided in writing in a language they will understand;</li><li>The freedom to terminate their employment at any time;</li><li>Appropriate notice termination provisions in favour of the contractor/temporary worker; and</li><li>The freedom to refuse overtime work and leave the premises at the end of their shift.</li></ul> <p>These workers will receive the same pay and benefits terms as any relevant Aristocrat Enterprise Agreement or in accordance with at least the minimum defined pay rates for their classification. Where possible, our practice is to permanently convert these workers to permanent employees on the same terms as current employees where the engagement is more than a temporary engagement.</p> <p>Where we do engage temporary workers and contractors indirectly through an employer of record, we have a service agreement in place which regulates their employment.</p> <p>For Aristocrat Gaming, we have updated all key staffing agreement templates for contingent workers globally to include specific clauses addressing modern slavery risks.</p> <p>We have also developed a standalone risk questionnaire for our People &amp; Culture teams globally to obtain further information on contingent worker engagements so that we can identify any additional modern slavery risks and assess what additional risk mitigation measures (if any) may be required.</p>	<p>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>		<p>There is no current projected change to the practice or frequency of using contractors/ temporary workers.</p>	<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 also aim 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>




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



A. Potential risks in our operations







Risk	Current Risk Status & Mitigations	Assessed Risk Change over Reporting Period	Projected Risk Change over Next Year	Projected Risk Change Rationale	Future Mitigations Under Consideration
<div><p><b>Industry, Sector, Product</b></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><p>Directly Linked</p><p>Contribute</p></div></div>	<p>Our Mergers &amp; Acquisitions (<b>M&amp;A</b>) due diligence process has embedded modern slavery due diligence requirements. This helps the business understand the specific risk factors associated with entering new business ventures and geographies before a target company is acquired. This enables us to identify modern slavery risks and incidents in the target operation and supply chain, and any systems and processes already in place to identify and address modern slavery risks in the target operation and supply chain and undertake appropriate due diligence of employees and contingent workers.</p>	<p>There was no projected risk change due to the nature of this risk.</p> <p>The modern slavery due diligence embedded in our M&amp;A processes was carried out for the acquisition of NeoGames (see <a href="#">Section IV(B)(2)(C)</a>).</p>	<p>N/A</p>	<p>Any further disclosure about the Group's future strategies regarding potential M&amp;A activity would be likely to result in unreasonable prejudice to the Group.</p>	<p>As we integrate NeoGames into the Group's modern slavery program, this risk and its mitigating actions will continue to be reviewed through post-acquisition reviews of the effectiveness of the integration playbook, and appropriate updates will be made as required.</p>
<div><p><b>Geographic</b></p><p>Modern slavery practices may be found within our operations.</p><div><p>Cause</p></div></div>	<p>The majority, almost 60%, 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, 10%, of our employees are in locations with a medium prevalence of modern slavery.</p> <p>Approximately 30% of our employees are in locations with a high prevalence of modern slavery.</p> <p>We note that the geographic risk is not specific to Aristocrat and would be applicable to any business operating in these locations. However, we take these risks seriously and have implemented the below mitigations and those mentioned in <a href="#">Section IV</a> to address these risks.</p> <p>In addition to the risk mitigations mentioned above related to our employment practices, we also generally aim for employment terms that are above minimum global contractual standards for all employees, even where those minimum standards may exceed local law requirements. Employee pay is governed by the Aristocrat <i>Global Reward Policy</i> that specifies median market pay for local and regional locations.</p> <p>Additionally, many global polices, including our Anti-Modern Slavery Policies, are available in the languages reflective of our global footprint.</p>	<p>With the acquisition of NeoGames, Aristocrat now has approximately 530 employees in Bulgaria, India, North Macedonia and Ukraine, which have a higher prevalence of modern slavery.</p> <p>As part of the M&amp;A integration process, all NeoGames employees are subject to Aristocrat's global employment policies and processes.</p>	<p>↑</p>	<p>There is the possibility, given the recent NeoGames acquisition, that employees may be located in countries with a higher prevalence of modern slavery, thereby increasing this risk.</p>	<p>The Group will continue to review the risk prevalence of the geographies in which we operate or any new geographies. As part of our M&amp;A integration plans, we will work to incorporate newly acquired companies and their employees into the standard Aristocrat policies and processes.</p>

A. Potential risks in our operations









Risk	Current Risk Status & Mitigations	Assessed Risk Change over Reporting Period	Projected Risk Change over Next Year	Projected Risk Change Rationale	Future Mitigations Under Consideration
<div><b>Industry, Sector, Product</b></div> <div>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.</div> <div>ContributeDirectly Linked</div>	<p>Although not formally part of our business supply chain, we still acknowledge the risk associated with donated or promotional goods.</p> <p>Aristocrat has determined that the modern slavery risk may be heightened, when:</p> <ul style="list-style-type: none"><li>the relevant goods, or components of the goods, are on lists such as the U.S. Department of Labor List of Goods Produced by Child or Forced Labor – such as toiletries containing palm oil;</li><li>there are allegations of poor or unlawful employment practices by the supplier;</li><li>promotional products and branded merchandise are associated with low cost and high-volume manufacturing;</li><li>products possibly contain materials that are known to be higher risk (e.g., cotton from the Xinjiang region of China).</li></ul>	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.	→	The types of goods that would be donated or used for promotional purposes are not expected to change significantly in the next year.	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







Risk	Current Risk Status & Mitigations	Assessed Risk Change over Reporting Period	Projected Risk Change over Next Year	Projected Risk Change Rationale	Future Mitigations Under Consideration
<div><div>Industry, Sector, Product</div></div> <div><b>Business Area:</b> Supply Chain - Direct</div> <div><b>Forced labour and/or child labour may be used in our suppliers' operations.</b></div> <div><div>Contribute</div><div>Directly Linked</div></div>	<p>Suppliers of electronic components are potentially higher risk, due to reported forced labour and child labour in consumer electronics factories (i.e., laptops, computers and mobile phones), particularly in some Asian countries.</p> <p>However, the electronic components sourced by Aristocrat are not “consumer electronics.” Aristocrat’s electronic products are different, being low volume, industry-specific, non-consumer products. Aristocrat continues to monitor this sector given the relatively high risk level associated with “consumer electronic components” generally.</p> <p>Aristocrat’s likelihood of this risk is further lowered as assemblies are bespoke, lower volume of electronic assemblies in our industry, meaning they require higher skilled employment.</p> <p>The vast majority of electronic assemblies supplied to Aristocrat are custom-made to Aristocrat’s specifications and as such we work extremely closely with our suppliers to influence their supply where practical.</p>	<p>The 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>We continued to conduct modern slavery specific supplier visits and on-site audits to identify potential indicators of modern slavery. While no modern slavery incidents were identified or reported, the Group did identify areas for suppliers to remediate their processes and we continue to work with our suppliers on the implementation of remediation action plans.</p> <p>For further information on these remediation actions, please see Section 2: Updates in FY24 (<a href="#">below</a>).</p> <p>We also increased visibility into the sub-tier supply to understand the electronic components purchased by our tier 1 suppliers.</p>		<p>The majority of the electronic component purchases are within the hardware supply chain. The level of risk in this category is forecasted to remain constant because the product categories will remain unchanged year over year.</p> <p>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 Item 8 below regarding the potential risk associated with our suppliers’ employment practices.</p>	<p>In the next financial year, we will continue to conduct modern slavery specific supplier visits and on-site audits, including the engagement of third-party auditors as appropriate.</p> <p>We will continue to increase visibility into the sub-tier supply to understand the electronic components purchased by our tier one suppliers.</p> <p>In addition, we plan to continue ongoing communication and oversight with key suppliers and sub-tier suppliers to seek further improvements.</p>
<div><div>Geographic</div></div> <div><b>Business Area:</b> Supply Chain - Direct</div> <div><b>Forced labour and/or child labour practices may be found within our suppliers' operations.</b></div> <div><div>Contribute</div><div>Directly Linked</div></div>	<p><b>Hardware:</b></p> <p>Most hardware suppliers operate in locations that have the lowest or medium prevalence of modern slavery.</p> <p>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.</p> <p>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.</p> <p><b>Digital:</b></p> <p>There are 4 countries in the digital supply chain, which provides mostly services, that are considered higher risk for modern slavery prevalence. We acknowledge this risk indicator.</p> <p><b>Interactive:</b></p> <p>Due to the timing of the NeoGames acquisition and consolidation of the Aristocrat Interactive business unit, we have not had sufficient time in this reporting period to investigate and map the supply chains for NeoGames. However, this will be one of our focus areas for the next reporting period as part of the broader assessment of Aristocrat Interactive’s supply chains.</p>	<p>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.</p>		<p>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.</p> <p>The digital and Interactive supply chain will look to leverage the actions and controls already in place for the hardware supply chain to ensure an enterprise-wide approach to managing our supply chains.</p>	<p>We will continue to conduct modern slavery specific supplier visits and on-site audits. This includes proactive assessments prior to suppliers moving to facilities in a new country.</p> <p>We will continue to engage with the Sourcing Resiliency Team to gain greater visibility into sub-tier supply.</p> <p>In the next year, we will look to expand the inclusion of our ethical sourcing clauses in most of our supplier agreements, with a focus on suppliers in countries that have a higher prevalence of modern slavery.</p>

B. Potential risks in our supply chains

Risk	Current Risk Status & Mitigations	Assessed Risk Change over Reporting Period	Projected Risk Change over Next Year	Projected Risk Change Rationale	Future Mitigations Under Consideration
<div><b>Working Condition</b></div> <div><b>Business Area:</b> Supply Chain - Direct</div> <div><b>Employment practices for our direct suppliers' workers (permanent and/or contractors/ temporary workers) are not compliant with laws in the applicable jurisdictions.</b></div> <div>ContributeDirectly Linked</div>	<p>We recognise that some locations in which our hardware suppliers operate may afford relatively limited legal protections to workers, but one way in which we mitigate this risk is by requiring suppliers to use their best efforts to comply with harmonised minimum standards globally, as set out in our Supplier Code of Conduct.</p> <p>Currently, Aristocrat has visibility into the hardware supply chain. As we continue to collaborate with these suppliers, we will gain additional visibility into their sub-tier suppliers to better identify and manage modern slavery risks in the lower tier supply.</p> <p>The hardware supply chain has Master Supply Agreements (<b>MSA</b>) in place with suppliers covering 96% of our annual spend. The MSA includes specific ethical sourcing and anti-modern slavery clauses, including employment related clauses and also requires these suppliers to comply with the Supplier Code of Conduct.</p> <p>We also conduct compliance probity checks for agreements of \$1 million or more. These include checks to identify any material litigation, enforcement actions or adverse media reports, including related to modern slavery issues. These probity checks for suppliers are renewed every three years, while for distributors, they occur annually.</p>	<p>Through our onsite audits in this reporting period, we identified several potential indicators of coercive labour practices with two of our suppliers, which we ultimately concluded did not involve coercive labour. For further information on these potential indicators and the actions taken to mitigate the risk, see <a href="#">Section 2: Updates in FY24 (below)</a>.</p>		<p>Although we believe the level of this risk may increase, our visibility of the risk within our supplier' operations will increase. We expect that as we continue to conduct compliance checks and on-site audits that there will be findings aligned with improving working conditions for their employees.</p>	<p>We will continue audits of Hardware suppliers in relation to compliance to the Supplier Code of Conduct. We may consider working with our tier 1 suppliers to conduct supplier surveys or audits of lower tier suppliers.</p>
<div><b>Industry, Sector, Product</b></div> <div><b>Business Area:</b> Supply Chain - Indirect</div> <div><b>Forced labour and/or child labour may be used in our suppliers' operations.</b></div> <div>ContributeDirectly Linked</div>	<p>The below services were identified as higher risk given the reliance on casual/temporary workers, unskilled workers, and migrant workers, who may be more vulnerable to exploitation, including forced labour and debt bondage:</p> <ul style="list-style-type: none"><li>Cleaning services</li><li>Facilities management services (including catering, construction, maintenance and security services)</li><li>Warehousing, distribution, and transportation services.</li></ul> <p>These services may be procured through our Indirect supply chain. To mitigate the risk of utilising Indirect suppliers engaged in modern slavery practices, the Indirect Sourcing team has included specific modern slavery questions as part of the Indirect request for proposal (<b>RFP</b>) process. Further, the Indirect Sourcing Policy points to our Anti-Modern Slavery Policy to ensure modern slavery risks are considered during Indirect purchasing.</p> <p>Indirect sourcing activities managed via formal RFP in normal circumstances will also require a formal agreement between Aristocrat and the service provider. This provides us the opportunity to include ethical sourcing clauses in these agreements in a risk-based manner. In addition, the Purchase Order Terms and Conditions also include references to ethical sourcing including specific reference to modern slavery and the Supplier Code of Conduct, further obligating Indirect suppliers to meet these requirements.</p>	<p>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 a Purchase Order.</p>	<p>We plan to update the RFP questions to have additional modern slavery questions for the Indirect product and service categories that are at highest risk for modern slavery. This will be done as part of a broader project to map/ categorise indirect spend based on the type of services, which will provide greater visibility of the types of services that may carry a higher modern slavery risk.</p>

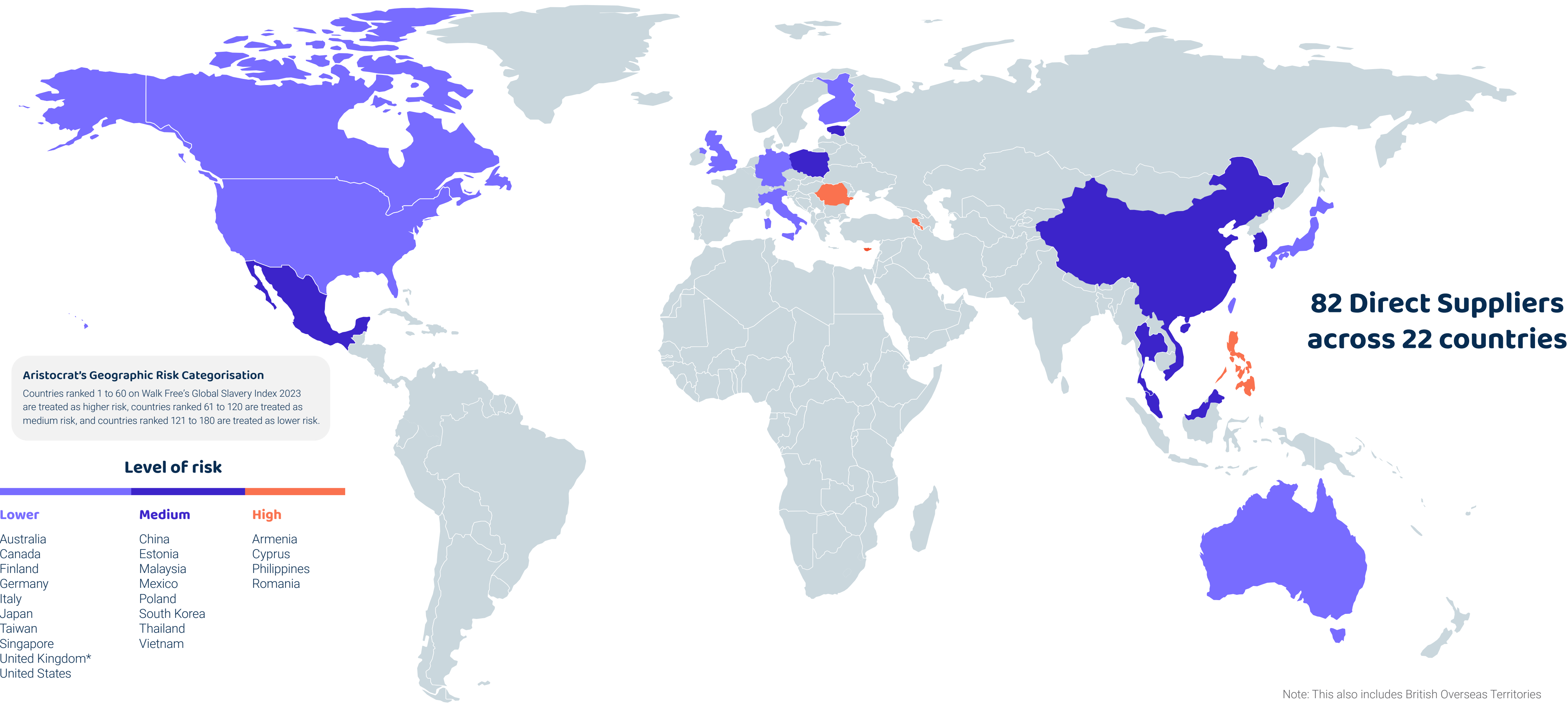


B. Potential risks in our supply chains

Risk	Current Risk Status & Mitigations	Assessed Risk Change over Reporting Period	Projected Risk Change over Next Year	Projected Risk Change Rationale	Future Mitigations Under Consideration
<div><b>Geographic</b></div> <div><b>Business Area:</b> Supply Chain - Indirect</div> <div><b>Forced labour and/or child labour practices may be found within our suppliers' operations.</b></div> <div><b>Contribute</b><b>Directly Linked</b></div>	<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, in India, Aristocrat has suppliers that provide cleaning and other facilities management services, such as catering and security services. We also have distribution arrangements with suppliers in Malaysia, the Philippines and several African countries.</p> <p>When evaluating potential suppliers, we follow our due diligence process to minimise this risk.</p>	N/A – this risk has been added for this reporting period to align with the risk profile for our direct (gaming) suppliers.	↑	There is the possibility, given recent acquisitions, that indirect suppliers may be located in countries with a higher prevalence of modern slavery, thereby increasing this risk.	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.
<div><b>Working Condition</b></div> <div><b>Business Area:</b> Supply Chain - Indirect</div> <div><b>Employment practices for workers hired through an indirect supplier may not be compliant with laws in the applicable jurisdictions.</b></div> <div><b>Contribute</b><b>Directly Linked</b></div>	<p>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:</p> <ul style="list-style-type: none"><li>• 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;</li><li>• 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</li><li>• 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 investigations are conducted annually for all distributors.</li></ul>	N/A – this risk has been added for this reporting period to align with the risk profile for our direct (gaming) suppliers.	→	Although there may be an increased risk associated with suppliers in new geographic locations (see above), 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 FY25 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)





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

As set out in [Section III](#), the Group’s approach to identifying modern slavery risks in our operations and supply chain is based on three key indicators. In this Section, we provide further details regarding our approach to assessing and addressing the identified risks. In summary:

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





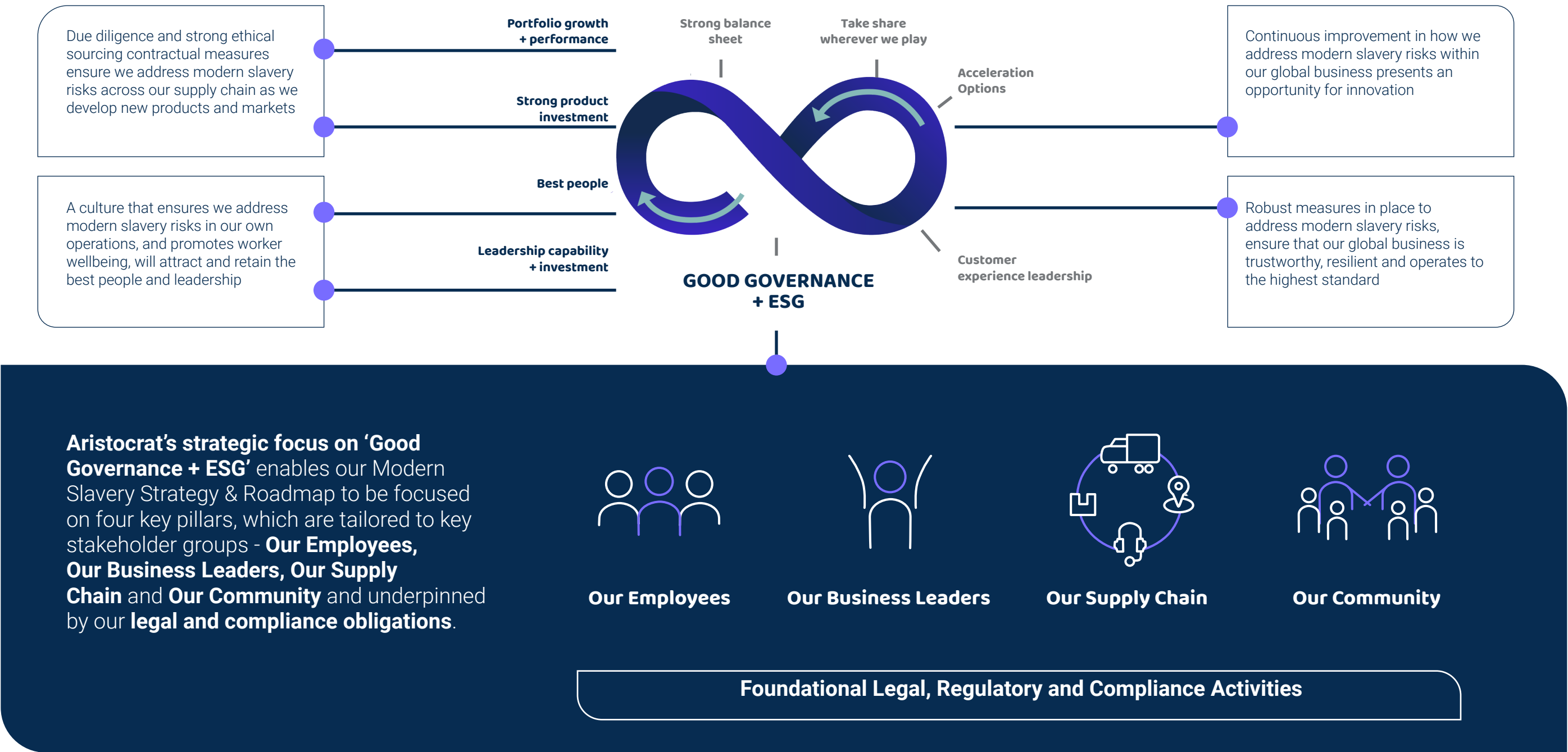
# A. Approach to assessing and addressing risks<sup>6</sup>

## 1. Strategic approach

The Modern Slavery Working Group continues to advance Aristocrat’s global anti-modern slavery program (**Anti-Modern Slavery Strategy and Roadmap**). The strategy underpins the activities in the roadmap and guides our decision-making in relation to our anti-modern slavery program. The Anti-Modern Slavery Strategy and Roadmap forms part of, and supports, the Group’s growth strategy, which is shown in the image to the right.<sup>7</sup> Specifically, while the Anti-Modern Slavery Strategy and Roadmap touches all aspects of the Group’s growth strategy through ensuring business sustainability, there are some aspects of the growth strategy that are more directly impacted.

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

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



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

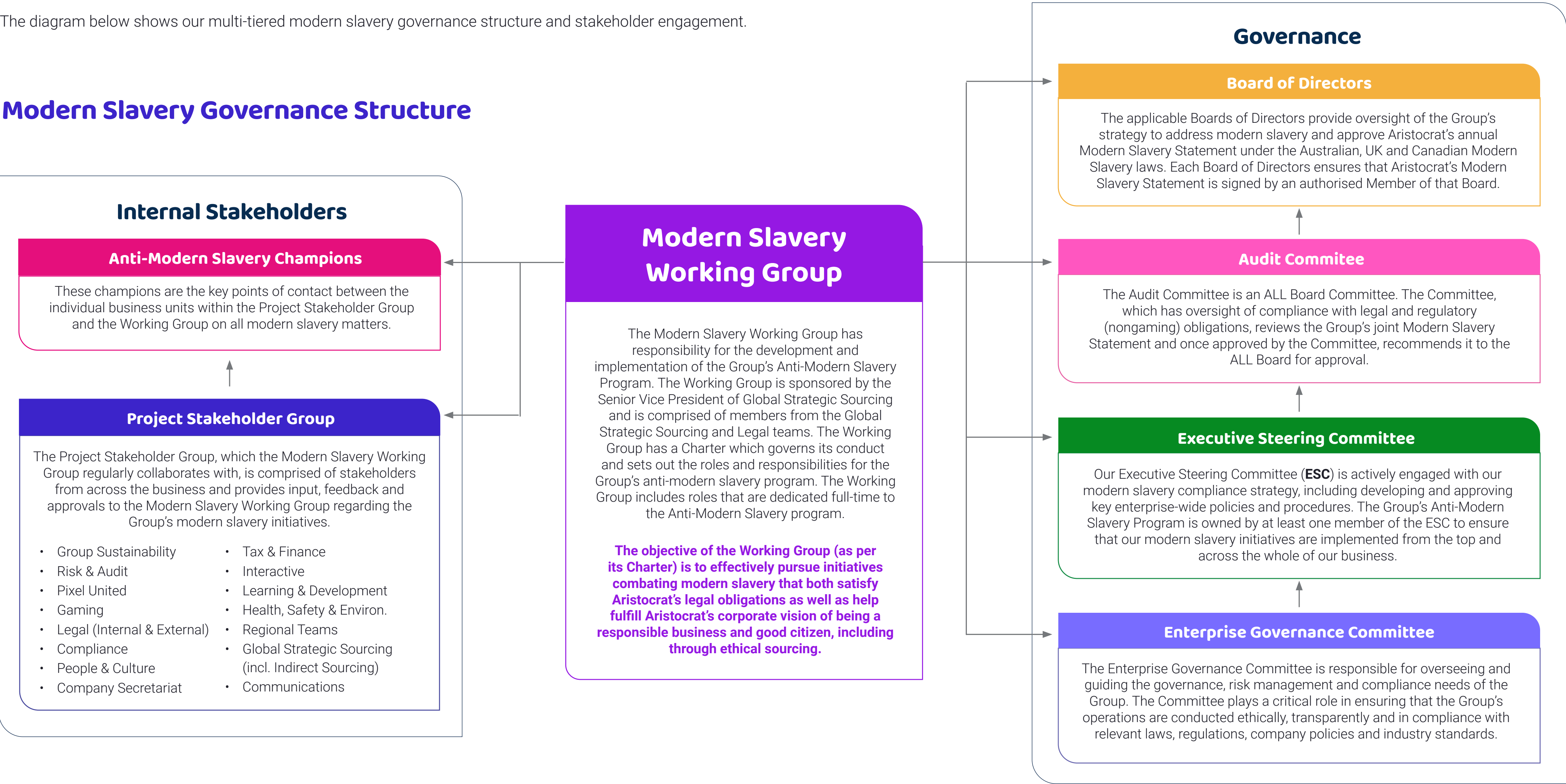
7. The image reflects Aristocrat’s growth strategy to 2025. Relevant updates will be provided in the next reporting period.



## 2. Governance and stakeholder engagement

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

### Modern Slavery Governance Structure



## B. Actions taken to assess and address risks

### 1. Foundational actions and controls to assess and address risks

The information below details the foundational actions and controls used to assess and address risks. These actions and controls were in place prior to FY24.

#### a. Policies, procedures and other documents

<div><div>Anti-Modern Slavery Policies</div><div><p>Group employees are subject to the Anti-Modern Slavery Policies which:</p><ul style="list-style-type: none"><li>• explain the concepts of modern slavery in layperson’s terms, without referring to specific legislative provisions;</li><li>• impose a “zero tolerance” approach for modern slavery within the Group’s business and supply chain;</li><li>• require 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</li><li>• identify several potential indicators of modern slavery to which Group directors, officers and employees should be alert, including restricted freedoms, poor working conditions or accommodation, improper financial arrangements, suspicious behaviours and appearances, and geographic risk factors.</li></ul></div></div>	<div><div>Code of Conduct</div><div><p>Group employees are required to comply with the Aristocrat Code of Conduct. It summarises important information to support all employees in having a common understanding of Aristocrat’s mission, values, key commitments and standards and rules that must be adhered to by all employees across the globe. This includes the Group’s commitment to continual improvement in its Anti-Modern Slavery Program through education, communication and collaboration.</p><p>Employees are required to read and acknowledge our most critical policies, including the Aristocrat Code of Conduct, when they commence employment with Aristocrat.</p></div></div>
	<div><div>Staffing Agreements</div><div><p>For Aristocrat Gaming, all our key staffing agreement templates for contingent workers have been updated to require third-party recruitment/labour hire agencies to (a) pay wages without deduction (except as required by law), and (b) give Aristocrat access to the agency’s records to enable Aristocrat to verify that workers are being paid accordingly.</p></div></div>

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

## Indirect Sourcing Policy & RFP Process



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

● 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 Global Strategic Sourcing (**GSS**). It is composed of two key steps:

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

**(2) ongoing supplier due diligence** assessments are conducted after the pre-approval process is completed to ensure that suppliers retain the ability to supply products to Aristocrat. The Supplier Due Diligence process is to be used on 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, evaluating the supplier’s capability and capacity, evaluation also includes 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, except for probity checks for suppliers 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.

Pre Approval of Direct Suppliers

Supplier Self Assessment

Master Supply Agreement

Ethical Sourcing  
Clauses

Supplier Code  
of Conduct

Compliance Probity

Supplier Visits / Audits

On-going Due Diligence

Supplier Surveys

Compliance Probity

Supplier Visits / Audits

Supplier Self-Assessment

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

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

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 issues to allow Aristocrat to understand how each supplier manages and responds to each of the below topics:

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

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

## Ethical Sourcing Clauses for Suppliers



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

## Supplier Code of Conduct



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

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

Aristocrat will assess a supplier's performance and commitment to compliance when making sourcing decisions, including the selection, retention, and remediation of issues with suppliers. In most instances, our preference will be to support suppliers to improve their standards over a reasonable period, rather than terminate supplier relationships.

At all times, our response to non-compliance will consider the best interests of workers who may be the victims of poor working conditions. Hardware suppliers are provided with an electronic copy of the Group's Supplier Code of Conduct upon signing an agreement with Aristocrat.



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Assess and Address

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

## Supplier Visits and Audits



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

Ahead of site visits, the Global Supply Chain management team reviews and refers to our “Guidance regarding supplier interactions on modern slavery issues” document. This guidance document provides best practice guidance to supplier-facing staff who attend supplier sites, on how to interact with suppliers if potential modern slavery issues are identified during an audit or site visit. The primary focus of the guidance document is to ensure that suspected modern slavery issues can be raised and addressed promptly and safely with suppliers in a manner that keeps potential victims of modern slavery safe from harm.

## Compliance probity checks



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

These probity checks are also carried out on a case-by-case basis where higher-risk locations, products and services are identified, 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

<b>Grievance Reporting Process &amp; Whistle Blower Program</b> 	<b>Global Whistleblower Policy</b> 	<b>Modern Slavery Incident Response Guide</b> 
<p>Employees can report actual or suspected modern slavery incidents:</p> <ul style="list-style-type: none"> <li>• to a dedicated email address monitored by key members of the Working Group. This email address is communicated to employees in the Anti-Modern Slavery Policies, the Modern Slavery Incident Response Guide, and our Anti-Modern Slavery training; and</li> <li>• through Aristocrat’s Whistleblower Program either directly to certain senior management across the Group or through a confidential, independent communication service provided by a third-party ethics and compliance specialist.<sup>9</sup></li> </ul> <p>The Whistleblower Program is communicated to employees through the Aristocrat Code of Conduct and mandatory Compliance Certification training. All details of the Whistleblower Program, including relevant contact information, are made readily available to employees on Aristocrat’s intranet.</p>	<p>Aristocrat’s Global Whistleblower Policy is our key global grievance mechanism and is designed to:</p> <ul style="list-style-type: none"> <li>• encourage people to raise concerns about reportable conduct;</li> <li>• inform people that a framework exists to protect them from detrimental treatment which may be suffered by them as a result of raising a concern; and</li> <li>• outlines how Aristocrat will respond to concerns raised.</li> </ul> <p>The global service is available 24 hours a day, 7 days a week and can be accessed online or by phone. Modern slavery grievances can be raised either through this channel or directly to certain senior management across the Group.</p> <p>The <i>Global Whistleblower</i> Policy is available on Aristocrat’s website.</p>	<p>The Modern Slavery Incident Response Guide (<b>Incident Response Guide</b>):</p> <ul style="list-style-type: none"> <li>• 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</li> <li>• includes guidance regarding the investigation and remediation of actual or suspected modern slavery incidents within the Group’s operations and supply chain.</li> </ul>

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

Aristocrat Modern Slavery Statement 2024 | **IV. The actions we have taken to assess and address modern slavery risks, including due diligence and remediation processes**

### d. Training

#### Modern Slavery Prevention Training

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

In addition to general training, Aristocrat has also implemented supplementary modern slavery training for:

- 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.
- Key People & Culture employees – this training is designed for members of our People & Culture Team who work on recruitment. The training focuses on potential modern slavery and human trafficking risks in our recruitment processes and discusses case studies.

### e. Other

#### External Legal Advice

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

● Address
● Assess
● Assess and Address





## 2. Updates in FY24

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 our supplier visits and on-site audits, as part of Aristocrat’s commitment to mitigate modern slavery risks in our supply chain. This reporting period, we conducted in-depth audits with a number of our key suppliers located in geographical regions where there is perceived to be a higher prevalence of modern slavery practices, based on independent data sources such as the Global Slavery Index. We partnered with third party anti-modern slavery experts to collaborate and develop a modern slavery audit methodology and assessment criteria for conducting our on-site audits. The third party also assisted Aristocrat in conducting the onsite audits and to work with key suppliers on collaborative improvement plans for any findings that resulted from the audits. Our process included: (1) assessing the suppliers; (2) identifying and documenting our audit findings (including any identified risks); and (3) collaboratively engaging with these suppliers to implement corrective actions to remediate any identified risks.

Through our onsite audits in this reporting period, we identified several potential indicators of coercive labour practices with two of our suppliers, including: payment of recruitment fees by migrant workers and certain restrictive rules in dormitories occupied by migrant workers.

In both instances, we followed our incident response procedures and, in consultation with external subject-matter experts, we sought further information regarding those issues, while being alert to the need to avoid causing or exacerbating harm to potential victims. Ultimately, we determined that the relevant entities had not been obtaining labour coercively, but we nonetheless agreed a corrective action plan to raise standards and improve the relevant entities’ approach to these issues in the future, to help mitigate future risks to other individuals. The relevant entities will also be subject to more regular audits, on an annual basis, to ensure prompt and continuing implementation of the agreed action plans.



**“ At Aristocrat GSS, 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 GSS 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 recognize 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 categorizes 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 Global Strategic Sourcing Team

## **b. New supplier onboarding process for indirect suppliers**

Our Indirect Sourcing team implemented a new supplier onboarding process during this reporting period. This onboarding process:

- 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;
- 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.

No modern slavery issues were identified as part of the onboarding process in this reporting period; however, we will continue to monitor responses for potential modern slavery issues in future reporting periods.



**c. Additional updates in this reporting period**

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

**a. Policies, procedures and other documents**

**Anti-Modern Slavery Policies**

We have undertaken a review of our Anti-Modern Slavery Policies in order to update them and consolidate them into one global policy. We expect this review to be completed and a consolidated policy made available for all Aristocrat employees in the next financial year.

**Compliance Questionnaire**

The potential indicators of coercive labour practices with two of our suppliers as identified during on-site audits ([see Section IV\(B\)\(2\)\(A\)](#)) were reported for the Modern Slavery Awareness questions in the FY24 self-certification questionnaire.

**M&A Due Diligence Process**

Members of the Working Group participated in the due diligence phase of the acquisition for NeoGames, with a focus on helping to identify potential risk factors associated with the acquisition, including through entering new geographies. As part of Aristocrat’s due diligence of NeoGames, we conducted a high-level review of NeoGames’ operating jurisdictions, its supply chain and existing practices and procedures adopted by the NeoGames business to identify and address risks of modern slavery in its operations and supply chain. This enabled 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.

Integration plans were subsequently developed to incorporate NeoGames and its workforce into standard Aristocrat policies and processes. This integration will continue in FY25.

Refer to [Section IV\(B\)\(1\)](#) for further details on the M&A due diligence process for the acquisition of NeoGames.

**b. Additional supplier due diligence**

**Ethical Sourcing Clauses for Suppliers**

We have created a reference guide to assist our legal teams globally in incorporating our ethical sourcing clauses into all supplier agreements. Where agreements are based on supplier terms or are otherwise the subject of negotiations with the counterparty, we will seek to ensure appropriate ethical sourcing clauses are included, having regard to the risks presented by the particular agreement.

**Supplier Code of Conduct**

As noted in [Section IV\(B\)\(2\)\(B\)](#), our new supplier onboarding process for indirect suppliers requires all suppliers to agree to our Supplier Code of Conduct.

We plan to review and update the Supplier Code of Conduct in the next financial year to reflect internal and external feedback. This will be done in consultation with several stakeholders, including Global Supply Chain, Legal and Corporate Affairs, as well as external subject-matter experts.

**c. Grievance**

**Global Whistleblower Policy**

During the year, the Global Whistleblower Policy was updated to incorporate some country specific updates where related laws may affect the application of Aristocrat’s Global Whistleblower Policy. The Policy was also updated to include hotline phone numbers in countries with more than ten employees and Key Direct Suppliers and Sub-Tier Suppliers. We are in the process of sharing these phone numbers with Key Direct Suppliers and Sub-Tier Suppliers so they can communicate any potential incidents of modern slavery within their own operations.

**d. Training**

**Modern Slavery Risk Assessment Training**

Aristocrat is planning to implement tailored training for our GSS leaders to better equip them with tools to identify potential modern slavery risks when visiting suppliers in the future. This training will be provided in the next financial year.

**f. Other**

**External Legal Advice**

The Working Group engaged external legal advisers to support our ongoing engagement with suppliers through our audit program.



### 3. The Group's approach to remediation

The Group's approach to remediation of modern slavery risks is based on four key principles, which reflect best practice guidance issued by the Australian, UK and Canadian governments. The four key principles are:

1. remediation actions should consider the best interests of actual or suspected victims – this includes recognition that immediate termination of our relationships with suppliers that are alleged to have engaged in violations of our standards may not be the most appropriate course of action, and could subject victims to even greater harm;
2. remediation actions should be designed to prevent ongoing harm, and to provide redress for past harm;
3. wherever possible, remediation actions should be collaborative and will be most effective when developed in collaboration with our suppliers; and
4. where lessons can be learned from specific incidents, we seek to share best practices within our own operations and, where appropriate, implement any improvements within our supply chain.

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

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

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

The Group did not receive any reports of modern slavery incidents in its operations or supply chain during this reporting period, however through our onsite audits in this reporting period, we identified several potential indicators of coercive labour practices with two of our suppliers, which we ultimately concluded did not involve coercive labour. Refer to [Section IV\(B\)\(2\)\(A\)](#) for further details.

### 4. Measures taken to remediate

While the Group did not identify any specific incidents of modern slavery, such as forced or child labour, in our operations or supply chain in FY24, through our onsite audits, we identified potential indicators of coercive labour practices with two of our suppliers and took steps to implement and action appropriate improvement actions with both suppliers. For further information on these remediation actions, please see [Section IV\(B\)\(2\)\(A\)](#). 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.

However, no measures were required to be taken in FY24 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.

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

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

Consistent with previous reporting periods, in FY24, the Working Group (in consultation with a variety of relevant stakeholders as set out in [Section IV](#)) has assessed the effectiveness of Aristocrat’s approach to mitigating modern slavery risks which is based on the Key Performance Indicators (**KPIs**) below, which were first set out in 2019 and tied to specific objectives for the early years of the modern slavery program. The effectiveness of our actions is assessed against the KPIs on an annual basis.





A. Modern slavery KPIs

Key Objective Category	Key Performance Indicator Definition	Summary of performance FY24
Employee training and awareness.	The percentage of Group employees, who have successfully completed modern slavery training	<div><div>99% General Training for all employees including Board members<sup>10</sup></div><div>100% Specific Supplier Facing Training</div><div>97% Specific P&amp;C Training</div><div>98% Employee Code of Conduct</div></div>
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.	<div>100%</div>
Audits of our Key Suppliers	Onsite audits or supplier visits of key suppliers to identify & mitigate potential modern slavery risks.	<p>In addition to supplier visits, four key supplier audits were carried out in FY24. Findings from these supplier audits have been identified and remediation actions are underway.</p> <p>For further details, see <a href="#">Section IV(B)(2)(A)</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.	<p>The Group did not identify any specific incidents of modern slavery in our operations or supply chain in FY24.</p> <p>Through our onsite audits, we identified potential indicators of coercive labour practices with two of our suppliers, but we ultimately concluded that those suppliers were not relying on coercive labour. Nonetheless, we took steps, in accordance with our Incident Response Guide, to implement and action appropriate improvement actions with both suppliers.</p>

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

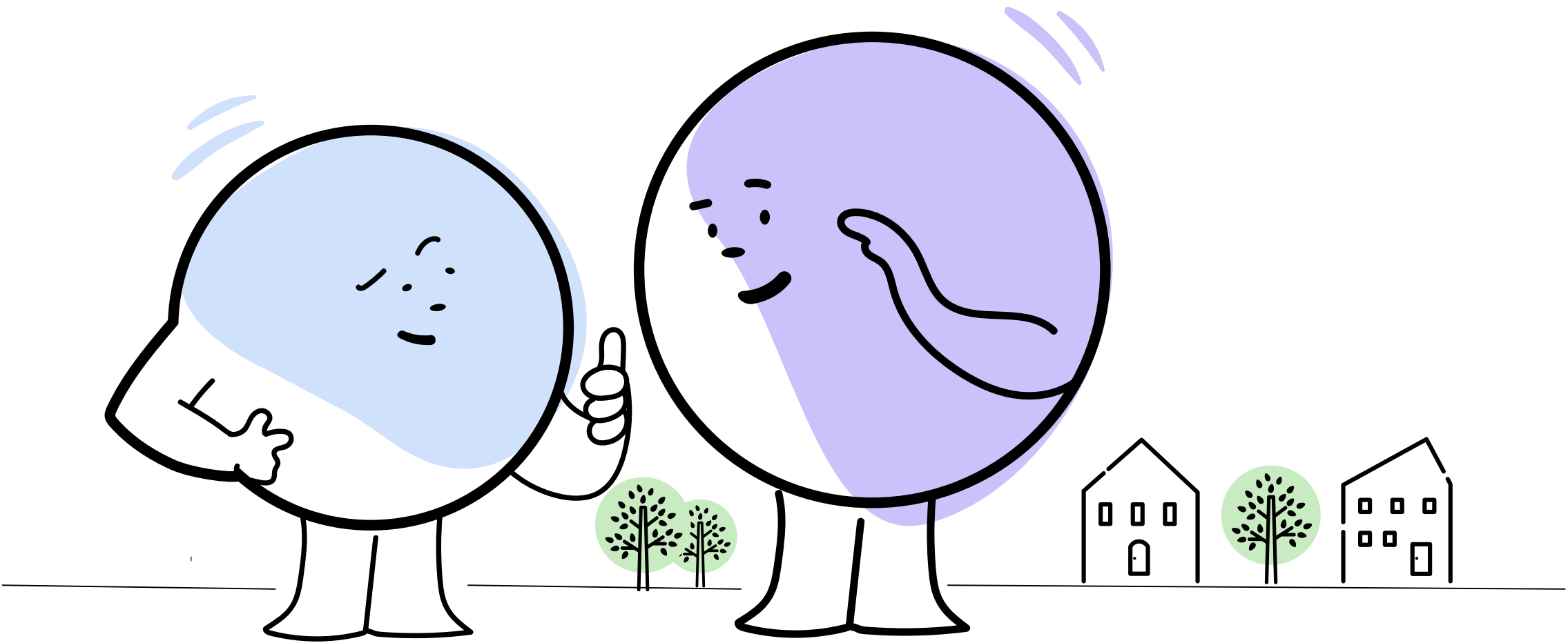
We are also pleased to report an increase in the effectiveness of our actions to improve employee awareness demonstrated by our senior executives taking ownership of our key internal modern slavery risks. Their ownership signals the importance of managing these risks to all employees.

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.

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

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

During the reporting period, Aristocrat held its inaugural 'ESG Day' for institutional investors, as part of an effort to increase engagement with equity market stakeholders in this important area. The day offered a detailed exploration of our plans and progress across a range of important sustainability topics, including Anti-Modern Slavery.





## VI. Consultation

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

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

Aristocrat also separately consulted with the wider Group. This included tailored communication with Pixel United and Aristocrat Interactive, recognising that the risk profile of Pixel United 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 Pixel United 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 FY24, 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:
- Summary of the process and outcome of our on-site supplier audits during the reporting period.
  - Details about modern slavery due diligence as part of the acquisition of NeoGames.
  - Summary of the new supplier onboarding process for indirect suppliers.
  - Additional risks for indirect suppliers added to the risk tables in [Section III](#) for alignment with direct suppliers.

We look forward to further engagement and collaboration, including with our suppliers, to enhance our visibility of what our peers are doing to address modern slavery issues, keep up to date with ‘best practice’ as it continues to evolve, and identify opportunities for improvement in our own practices and initiatives.

## B. Government resources and key developments

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

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

We also regularly monitor developments in modern slavery laws globally.



C. Relevant matters impacting our business

1. Ukraine conflict

The impact of the ongoing conflict in Ukraine 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.

Prior to the conflict, approximately 1,000 people working for business units within Pixel United were in Ukraine. Aristocrat’s exposure to the conflict in Ukraine increased with the acquisition of NeoGames, which also has a presence in Ukraine. Specifically, the Group has offices in Lviv, Kyiv and Kharkiv, with further employees working in remote locations across the country. Aristocrat, Aristocrat Interactive and Pixel United have taken steps to assist Ukraine-based employees and their families to voluntarily relocate, either internationally or to safer locations within Ukraine.

To provide a permanent base for those who have relocated overseas, and to expand and further diversify the company’s development capabilities in global game talent hubs, four new studios have been opened across Poland, Spain and Canada. Where possible, supplier relationships in Ukraine have continued.

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

2. Middle East conflict

The impact of the ongoing conflict in the Middle East on employees was and 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.

Prior to the conflict, approximately 206 people working for business units within Pixel United were in Israel. Aristocrat’s exposure to the conflict in the Middle East increased with the acquisition of NeoGames, which also has a presence in Israel. Specifically, the business has offices in Tel-Aviv, with some employees working remotely in other locations near Tel-Aviv. Aristocrat, Aristocrat Interactive and Pixel United have taken steps to assist Israel-based employees and their families to cope and manage the conflict, as best as possible, including but not limited to additional work from home and self-care days.

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

Aristocrat continues to monitor and evaluate these situations, focusing on crisis and business continuity management and continuing to offer support (including relocation) where possible to impacted employees.

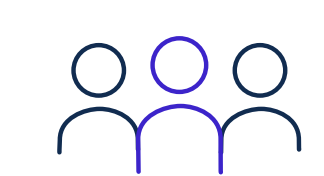
3. Regulatory developments

We have also been keeping up to date with developments in the anti-modern slavery landscape and 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 the 2023 Global Slavery Index; and
- the appointment of Australia’s first federal Anti-Slavery Commissioner.

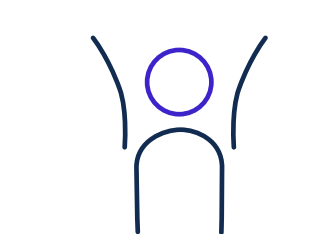
## D. Looking ahead - Our future roadmap

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



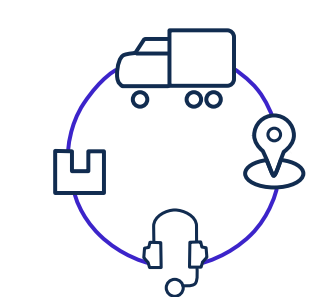
### Our Employees

- Provide supplemental modern slavery training to key staff who respond to whistleblowing complaints.
- Review and update our general modern slavery training for all employees.



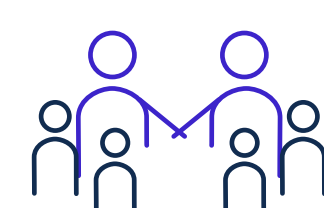
### Our Business Leaders

- Implement tailored training for our GSS leaders to better equip them with tools to identify potential modern slavery risks when visiting and auditing suppliers.
- Conduct test scenarios relating to a hypothetical modern slavery allegation and gather feedback from key responsible parties.
- Work with both our M&A and P&C teams to ensure the post-acquisition Integration Playbook aligns with the modern slavery protocols that exist enterprise wide.
- Continue to work with the Indirect Sourcing team to enhance our modern slavery RFP questions to reflect additional scrutiny for high-risk indirect categories.



### Our Supply Chain

- 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.
- Finalise and publish an updated GSS Supplier Due Diligence Process.
- Publish the next iteration of our Supplier Code of Conduct.
- Continue to map and assess the supply chain(s) for Aristocrat Interactive to identify key suppliers and potential modern slavery risks.



### Our Community

- Continue to mature our modern slavery risk audit capabilities, working with subject matter experts from the community. This includes the delivery of a robust leadership training program to conduct on site audits.
- Continue to consider how to best support organisations that align with our values.



# VIII. Addressing mandatory criteria

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

Section in Modern Slavery Statement	Australian Modern Slavery Act	UK Modern Slavery Act	Canadian Modern Slavery Act
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 III (The risks of modern slavery in our operations and supply chains)	A statement must describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls (section 16(1)(c))	A statement may include information about the parts of the organisation’s business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk (section 54(5)(d))	A statement must include information about the parts of its business and supply chains that carry a risk of forced labour or child labour being used and the steps it has taken to assess and manage that risk (Section 11(3)(c))
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: a. the organisation’s policies and its due diligence processes in relation to forced labour and child labour; (Section 11(3)(b)) b. training provided to employees on forced labour and child labour; (Section 11(3)(f)) c. any measures it has taken to remediate any forced labour or child labour; and (Section 11(3)(d)) d. any measures it has taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chain. (Section 11(3)(c))

Section in Modern Slavery Statement	Australian Modern Slavery Act	UK Modern Slavery Act	Canadian Modern Slavery Act
<a href="#">Section V</a> (Assessing the effectiveness of our actions)	A statement must describe how the reporting entity assesses the effectiveness of such actions (section 16(1)(e))	A statement may include information about the organisation’s effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate (section 54(5)(e))	A statement includes information about how the organisation assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chain. (Section 11(3)(g))
<a href="#">Section VI</a> (Our consultation process)	A statement must describe the process of consultation with any entities that the reporting entity owns or controls; and in the case of a reporting entity covered by a statement under section 14—the entity giving the statement (section 16(1)(f))		
<a href="#">Section VII</a> (Other Important Information)	A statement must include any other information that the reporting entity, or the entity giving the statement, considers relevant (section 16(1)(g))		
<a href="#">Section IX</a> (Approval and signing)	For a joint modern slavery statement, the joint modern slavery statement must be approved and signed in accordance with one of the options set out in (section 14(2))	For bodies corporate, a statement must be approved by the board of directors and signed by a director (section 54(6)(a))	The statement must be approved by the organisation’s governing body. The statement must include: A statement that sets out whether it was approved pursuant to the approval of the governing body; and The signature of one or more members of the governing body of each part of the organisation/subsidiary that approved the statement.



# IX. Approval and signing

In accordance with section 14 of the Modern Slavery Act 2018 (Cth), this joint Modern Slavery Statement for Aristocrat Leisure Limited, Aristocrat International Pty Ltd, Aristocrat Technologies Australia Pty Limited and Aristocrat Global Holdings Pty Ltd was approved by the Board of Aristocrat Leisure Limited as the parent entity on 19 February 2025, 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  
19 February 2025  
Date

*Trevor Croker*

Signature  
Trevor Croker  
CEO & Managing Director  
19 February 2025  
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 2025, 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, Games  
25 March 2025  
Date

In accordance with section 54 of the Modern Slavery Act 2015 (UK), this Modern Slavery Statement was approved by the Board of Aristocrat Technologies Europe Limited effective 25 March 2025, 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 2025  
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 2025, 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 2024.

I have authority to bind Aristocrat Technologies Canada, Inc.

*Craig Toner*

\_\_\_\_\_  
Signature

Craig Toner  
\_\_\_\_\_  
CEO Aristocrat Gaming

25 March 2025  
\_\_\_\_\_  
Date





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