

2023 MODERN SLAVERY STATEMENT

The Star Entertainment Group

ABOUT THIS STATEMENT

This statement, pursuant to the Australian Modern Slavery Act 2018 (Cth) (**Act**), contains the activities undertaken by The Star Entertainment Group Limited (“The Star”) ABN 85 149 629 023 to understand and address modern slavery risks in our business, operations, and supply chain for the financial year 1 July 2022 to 30 June 2023. This statement covers The Star as a single reporting entity. It has been approved by the Board of Directors and has been signed by the CEO and Managing Director.

The Star acknowledges the Traditional Owners of the land where our properties are situated. This includes the Turrbal and Jagera people of the Brisbane region, the Yugambeh language people of the Gold Coast, and the Gadigal people of the Eora Nation in Pymont. We pay our respects to Elders past and present.

A MESSAGE FROM OUR CEO

At The Star we are committed to upholding human rights throughout our operations and supply chain and recognize the severity of modern slavery and the devastating impact it can have on individuals and communities.

We work with our team members, suppliers, and partners to establish transparent and responsible practices that prioritise the safety and dignity of workers, identifying and managing risks and issues through our due diligence process and risk management framework.

This year, we have continued our efforts to understand modern slavery risks in our operations and supply chain more deeply to assist our teams and suppliers identify and manage these risks.

We believe that a commitment to human rights is not only the right thing to do but also essential for building a sustainable and responsible business. We will continue to prioritise this commitment and work towards creating a better future for all.

Sincerely



Robbie Cooke
Group CEO | Managing Director

Contents

ABOUT THIS STATEMENT	1
A MESSAGE FROM OUR CEO	2
INTRODUCTION	4
OUR SUSTAINABILITY STRATEGY	5
Criteria 1: REPORTING ENTITY - THE STAR ENTERTAINMENT GROUP	6
Criteria 2: OPERATIONS AND SUPPLY CHAIN	7
Criteria 3: RISKS OF MODERN SLAVERY	9
Criteria 4: ACTIONS TAKEN TO ASSESS AND ADDRESS MODERN SLAVERY RISKS	12
Criteria 5: TRACKING EFFECTIVENESS	18
Criteria 6: CONSULTATION WITH ENTITIES OWNED OR CONTROLLED	19
Criteria 7: OTHER RELEVANT INFORMATION	19

INTRODUCTION

The term modern slavery is used to describe situations where coercion, threats or deception are used to exploit victims and undermine or deprive them of their freedoms. The Modern Slavery Act defines modern slavery as including eight types of serious exploitation: trafficking in persons; slavery; servitude; forced marriage; forced labour; debt bondage; deceptive recruiting for labour or services; and the worst forms of child labour.

Modern slavery is a large and complex problem that affects millions of people worldwide. The 2021 Global Slavery Estimates indicate there are 49.6 million people living in situations of modern slavery on any given day, either forced to work against their will or in a marriage that they were forced into. Forced labour accounts for 27.6 million of those in modern slavery and forced marriage for 22 million, or nearly one of every 150 people in the world.

Unfortunately, it is a situation that is getting worse. The data for 2021 reveals an increase of approximately 10 million more men, women, and children who have been forced to work or marry since the last estimates were published in 2017.

The Global Slavery Index estimates that on any given day in 2021, there were 41,000 people living in modern slavery in Australia.

Australia is also exposed to the risk of modern slavery through the products it imports. According to the Global Slavery Index, the top 5 products at risk of modern slavery through imports are electronics, garments, solar panels, textiles, and fish.

Product at risk of modern slavery	Import value (in billions of \$US)	Source Countries
Electronics	8.9	China, Malaysia
Garments	6.4	Argentina, Bangladesh, Brazil, China, India, Malaysia
Solar Panels	1.3	China
Textiles	0.5	China
Fish	0.4	China, Ghana, Indonesia, Taiwan, Thailand
<i>Source: Global Slavery Index: Country Study Australia</i>		

As one of Australia’s largest single site employers and a major hospitality and entertainment provider, The Star strives to protect and support the rights and freedoms of our customers, employees and those employed by our suppliers.

The Star has developed its approach to modern slavery based on the United Nations “Protect, Respect and Remedy” Framework, and as participants of the UN Global Compact we report annually our Communication of Progress towards the 10 United Nations Ten Principles and the Sustainable Development Goals.

We expect and require our suppliers to understand these commitments, and to accept the conditions in our Supplier Code of Conduct.

The Star’s modern slavery statement refers directly to the mandatory reporting criterion detailed in the Modern Slavery Act.

OUR SUSTAINABILITY STRATEGY

Responsible Business, Sustainable Destinations

The Star Entertainment Group is committed to minimising our impact on the environment, operating responsibly to create safe and memorable experiences for guests as well as fostering wellbeing for our team members and the community.

In the 2022 calendar year, we launched our new Sustainability Strategy – “Responsible Business, Sustainable Destinations”, which responds directly to The Star’s most material ESG issues as determined by our annual materiality assessment.

The Responsible Business, Sustainable Destinations strategy has been aligned to the United Nations Sustainable Development Goals (SDGs) to understand how our actions impact global sustainability priorities.

In managing risks and opportunities presented by our most material issues, we contribute to SDGs 3, 6, 7, 8, 9, 11, 12, 13, and 16. As part of our business management practices, we contribute to goals 4, 5, 10, 15 and 17.

Setting our strategy included a review of global peers, best practice, and a review of stakeholder, investor, community, and team member feedback. A series of workshops helped to set our ambition level, establish targets, and outline pathways to achieve our goals.

Upholding human rights is fundamental to our business and underpins all that we do for our people, our guests, our partners and our communities. It is reflected through our values and is at the heart of our business. That’s why we have not called it out as a specific issue to be included in the assessment process.

The 3-pillar strategic framework addresses our most material issues, under two focus areas:

RESPONSIBLE BUSINESS focuses on operating ethically and responsibly to minimise harm to people and the environment and adhere to the high expectations of regulators and the communities in which we operate.

SUSTAINABLE DESTINATIONS focuses on integrating sustainability into the planning and operations of our properties to reduce our ecological footprint, enhance resilience, and create an inclusive and inviting environment for everyone.

For more information, go to starentertainmentgroup.com.au/annual-reports for The Star’s 2023 Sustainability Report.

Criterion 1: REPORTING ENTITY - THE STAR ENTERTAINMENT GROUP

The Star Entertainment Group Ltd is Australia's largest listed casino entity, operating landmark venues in Sydney, Brisbane and the Gold Coast. The Star also manages the Gold Coast Convention and Exhibition Centre on behalf of the Queensland Government.

The Star Entertainment Group and its joint venture partners Chow Tai Fook Enterprises and Far East Consortium are developing the \$3.6 billion Queen's Wharf Brisbane precinct. Expected to commence a staged opening in the first half of 2024, Queen's Wharf and The Star Brisbane will deliver transformational impacts on Queensland jobs, training and tourism, both domestic and international.

We take great pride in our commitment to supporting the communities in which we operate across Sydney and South-East Queensland. Following the reviews into how we operate as an organisation we are committed to transforming our business at every level and building a safer, stronger, more sustainable future at The Star.

Pathway to Suitability

The Bell and Gotterson reports of 2022 resulted in \$100 million fines in both NSW and QLD, the indefinite suspension of our NSW casino licence and the deferred suspension of our Queensland casino licences. The Star acknowledged transformative steps were required to return to suitability in NSW and Queensland and enable it to meet societal and regulatory expectations as a responsible corporate citizen.

The Star's remediation program has the goal of earning back the trust and confidence of regulators, governments, shareholders, team members, guests, and the community at large.

The Star wants to be known for being transparent, accountable, and trustworthy. A values-led company with robust governance. A company where our team members feel safe and free to raise concerns wherever arising, and leaders listen and act when those concerns are raised.

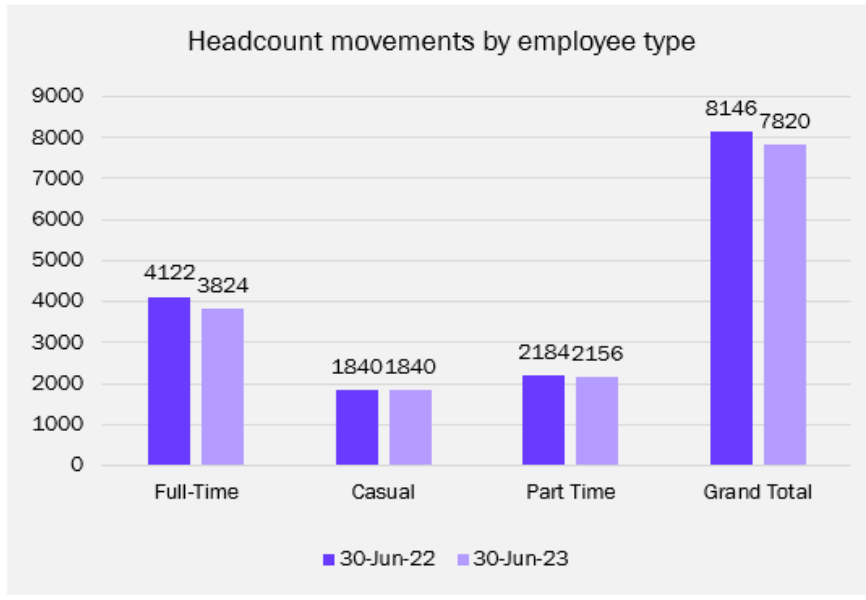
Structure

The Star operates The Star Sydney, The Star Gold Coast and Treasury Brisbane. The Star also manages the Gold Coast Convention and Exhibition Centre on behalf of the Queensland Government, and has investments in strategic joint ventures including, but not limited to Destination Brisbane Consortium delivering Queen's Wharf Brisbane, and Destination Gold Coast Consortium delivering The Star Gold Coast Masterplan.

For detailed information on The Star Entertainment Group structure please refer to Page 72 in the 2023 Annual Report which can be found at starentertainmentgroup.com.au/annual-reports

Workforce Composition

The Star employs approximately 8,000 people across our operations, across a mix of permanent, part-time, and casual roles.



Criterion 2: OPERATIONS AND SUPPLY CHAIN

The Star’s governing structure is through its Board of Directors and Group Leadership Team, which manages the strategic direction and management of the company and its owned and operated entities.

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

- Casino and gaming
- Restaurants and bars
- Food and beverage outlets
- Theatre and entertainment
- Retail outlets
- Conferencing facilities
- Spa and personal services
- Accommodation
- Car parking

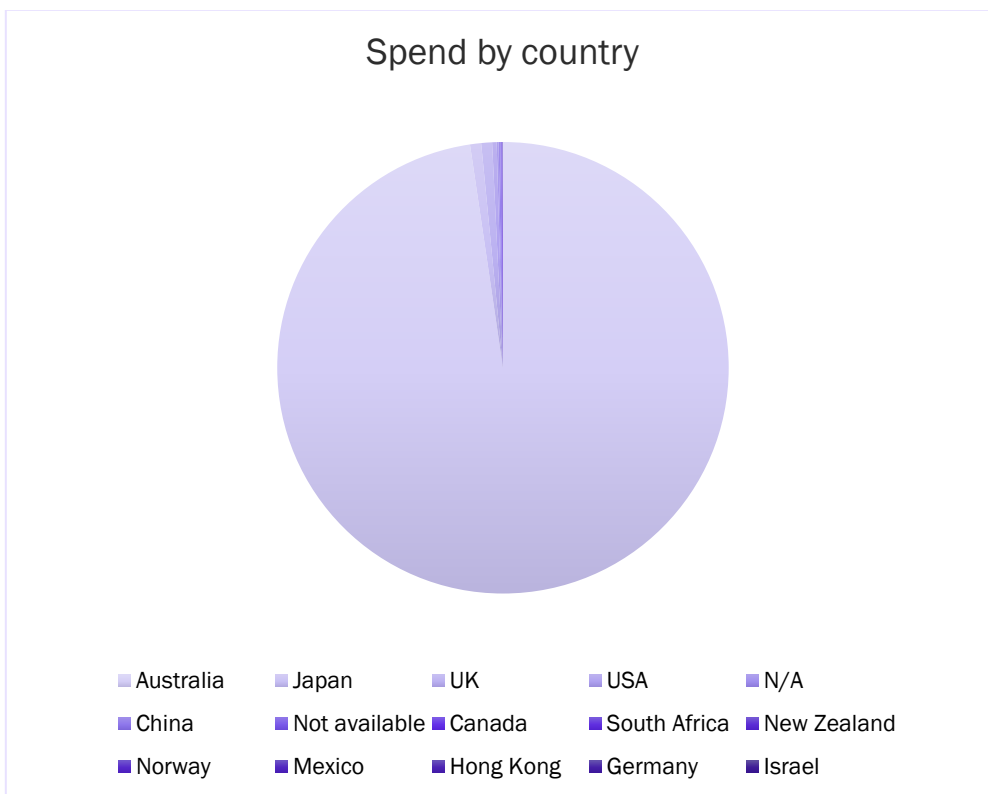
Supply Chain

The Star buys goods and services from a diverse supplier base across a range of categories including soft services, food and beverage, construction and equipment, IT, corporate and professional services, transport and travel.

In FY23, The Star purchased products and services from approximately 2044 suppliers with a spend of approximately \$593 million. This is an increase on the previous year's spend, which is due to FY22 reflecting reduced capital spend and the impact of COVID-19 on operations. Supplier spend includes both capital and operational expenditure and does not include payments passed through Accounts Payable that do not relate to the provision of goods and services.



We expect all our suppliers to operate consistently with our Supplier Code of Conduct, which includes key requirements to act honestly in business and respect human rights, the environment, diversity, and equal opportunity.



. 98% of total spend is with direct suppliers located in Australia.

Criterion 3: RISKS OF MODERN SLAVERY

The Star is a member of the UN Global Compact, and we follow the United Nations Guiding Principles on Business and Human Rights (UNGPs) when developing our approach to understanding and addressing risks of modern slavery within our operations and supply chain.

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

A risk-based due diligence process, data analysis of our direct suppliers, and utilising information from the Global Slavery Index has allowed The Star to identify the following inherent risks which will continue to guide our approach to our team member education and supplier engagement as we evolve our modern slavery program.

Operations

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

Direct Employees

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

Indirect employees - Contractors / contingent workers

- Modern slavery / labour exploitation risks are higher in supplier categories that involve employment of migrant workers through third-party or outsourced providers.
- Inherent risks include forced labour, deceptive recruiting, debt bondage, payment, working hours, health, and safety.
- **Risk mitigation:** Tender process includes modern slavery and labour rights criteria, supplier reviews and audits, contract clauses relating to modern slavery. Training and education for relevant team members.

Customers

- Risks associated with modern slavery may be due to money laundering proceeds from organized crime which may include human trafficking and modern slavery / exploitation.
- Human trafficking risks associated with hotels / casinos.
- **Risk mitigation:** Advanced AML/CTF program and probity checks. Advanced security, surveillance, and investigations approach including collaboration with law enforcement. Training and education for relevant team members.

Retail Lease Holders

- Retail lease holders may be at risk of modern slavery in their operations and supply chain.
- **Risk Mitigation:** Contract clauses relating to modern slavery have been introduced in Sydney, with QLD properties to follow.

Case Study: Cleaning and Housekeeping contractors

In FY23, concerns were raised by employees of four contractors providing cleaning or housekeeping services that resulted in supplier audits and the discontinuation of three suppliers and remediation with the fourth.

As a result, The Modern Slavery Working group developed a Strategic Action Plan for the soft services category which includes the following initiatives:

- Increased and targeted questions in the tender process, with higher weights for modern slavery/labour rights in decision-making criteria.
- Detailed information requested as part of the tender process regarding rates of pay, penalties, and entitlements to assess fair wages are accounted for in the tender price, and to provide a basis for on-going audit and review.
- Inclusion of labour rights/modern slavery in tender presentations and on-going supplier reviews.
- Engagement with procurement team, relationship managers and social responsibility through the tender process.
- Checking in with Unions to determine if any known issues or concerns regarding potential suppliers.
- Agreements for new contractors contain monthly KPIs related to awareness of The Star's Whistleblower Protection policy and process, and compliance with workplace laws.

Supply chain

In FY22, The Star analysed 99% of direct suppliers to identify inherent modern slavery risks related to industry, geography, and other modern slavery risk indicators. This analysis found that most suppliers were of low-medium inherent risk.

Using this analysis and overlaying information from the 2021 Global Estimates of Modern Slavery, in FY23 The Star created a modern slavery risk matrix to better understand inherent risk deeper in the supply chain, the type of risk and the type of modern slavery that may be involved.

This matrix is used by the social responsibility, procurement, and supply chain teams to develop supporting policies and processes, and to engage with suppliers before and during their engagement with The Star to better understand and address risks.

Modern Slavery Risk Matrix

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

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

The Star takes a long-term view towards responsible and sustainable procurement with relationships with our suppliers being future focussed and mutually beneficial.

The Star’s Modern Slavery Statement FY23 will be the fourth published statement that provides a response to requirements under the Act. The Star’s Modern Slavery program is based on the Guidance for Reporting Entities provided by the Australian Government and adopts a human rights due diligence framework, with the following priorities:

POLICY COMMITMENT

The Star makes statements of commitment to respecting human rights and combatting modern slavery in the Annual Report, Sustainability Report, Global Compact Network Annual Communication of Progress, and annual Modern Slavery Statement.

Our commitment to human rights within our operations and supply chain is supported by a framework of governing policies and strategies. Policies are available on the company intranet and company website, and re-enforced through stakeholder engagement, education, and training.

Ethical Sourcing Policy

Our Ethical Sourcing Policy articulates the ways in which the sourcing of goods and services will support ethical, responsible, and sustainable practices, including addressing Modern Slavery risks in our supply chain. This policy is applied for all sourcing decisions across our properties.

Supplier Code of Conduct

Our Supplier Code of Conduct outlines expectations and requirements in the following areas, and suppliers are required to comply with the Code as part of the contracting process.

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

Supplier management

Since 2021, tenders for major supplier partnerships have included questions related to modern slavery. Responses are assessed by the Group Manager Social Responsibility with scores forming part of the overall consideration and decision-making process.

Supplier contracts

There is a Modern Slavery clause within the standard Purchase Order and Supplier Agreement contracts for new suppliers that require suppliers to:

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

Further, in the standard form Supplier Agreement there is an audit clause which states that each of the Supplier's obligations under the Modern Slavery clause are auditable obligations and at any time during the term of the agreement The Star may, at their expense, audit the supplier's compliance.

Policy and governance supporting Team Members

Our governance and policy framework is designed to support all team members to work in an environment that ensures their rights and freedom of association as well as health and safety, diversity, equity and inclusion and freedom from bullying, harassment, or discrimination. This includes team members employed directly, or indirectly. Policies are available on the company intranet and external websites, and include:

- Code of Conduct – available in four languages, including English.
- Grievance Policy.
- Whistleblowing Protection Policy and independent whistleblowing hotline.
- Procurement Policy.
- Diversity and Inclusion Policy.
- Health and Safety Policy.
- Equal Employment Opportunity.
- Discrimination and Harassment Policy.

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

The Star is committed to diversity, equity and inclusion and reports annually to the Workplace Gender Equality agency (WGEA).

In 2021 The Star was awarded the WGEA Employer of Choice for Gender Equality and was recognised for LGBTIQ+ inclusiveness in the workplace with a Gold Award in 2022 by the Australian Workplace Equality Index (AWEI).

DUE DILIGENCE

Assessing risks

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

Inherent risk assessment

The Star has assessed inherent modern slavery risks with 99% of direct suppliers through data analysis in FY22. This includes both capital and operational expenditure and does not include

payments passed through Accounts Payable that do not relate to the provision of goods and services.

Modern Slavery Risks were mapped against the Global Estimates of Modern Slavery and other data sources which highlight inherent geography, industry, or product risks.

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

Results from the FY22 data analysis indicated most suppliers had a low-medium inherent risk rating. This data analysis is used to support awareness and supplier engagement with higher risk suppliers. We also understand there are risks for vulnerable workers as well as those deeper in the supply chain that need to be better understood and managed.

Supplier Deep Dive

Supplier deep-dives are desktop research reviews that are undertaken on current or potential suppliers to better understand their operational governance and potential risks of modern slavery.

Self-assessment questionnaires

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

In FY23, The Star engaged with suppliers in categories identified as having a potentially higher risk, being uniforms and linen, uniform and linen laundry, and furniture and fit outs, and hotel guest amenities. Suppliers in these categories were requested to complete a self-assessment questionnaire and engage with social responsibility and procurement as required.

Assessing involvement in potential or actual adverse impacts

When a potential or actual adverse impact is identified, The Star assess their involvement to determine which actions should be taken to cease, prevent and/or mitigate the respective adverse impact, as well situations that require remediation, or leverage to influence the business relationship (even when indirect) causing the adverse impact.

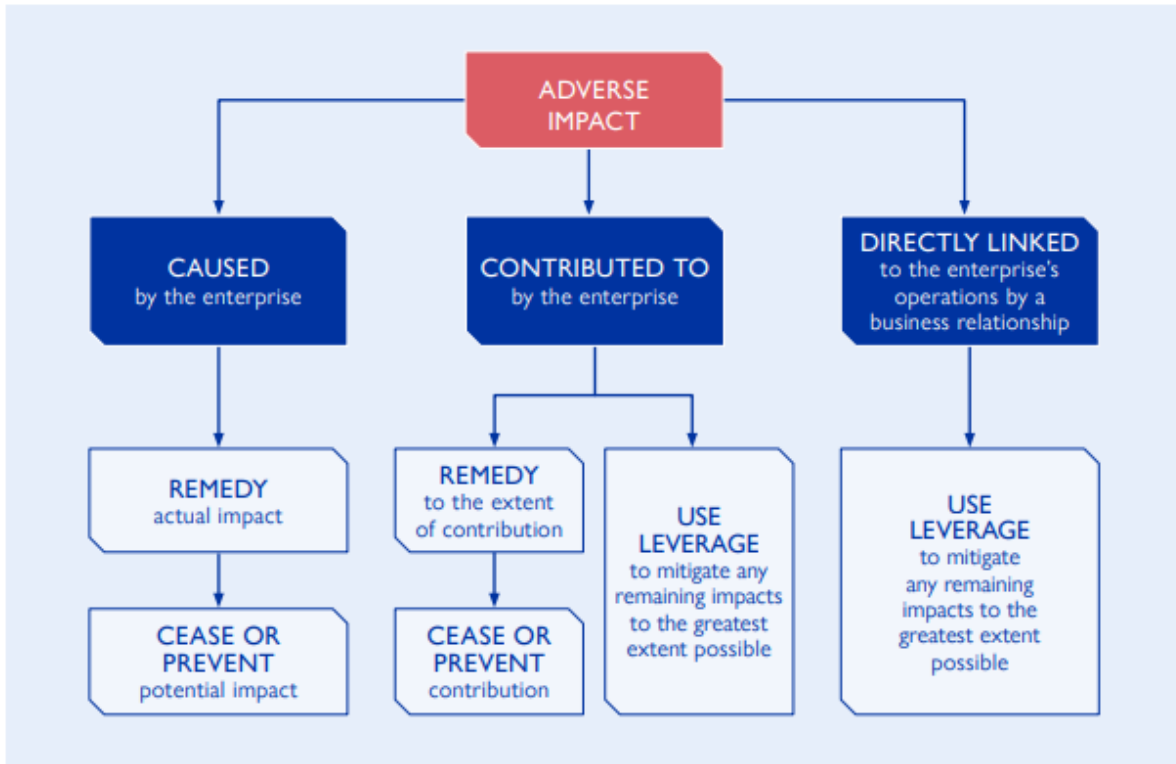
According to the UNGPs, there are three ways in which an enterprise can be involved in an adverse human and labour rights impact:

1. It may cause the adverse impact through its own activities.
2. It may contribute to the adverse impact through its own activities, either directly or through an outside entity.

- It may neither cause nor contribute to the adverse impact but may be directly linked to the adverse impact through a business relationship.

Responding to potential or actual adverse impacts

The Star uses the following guidance from the UNGPs when determining how to respond to potential or actual adverse impacts according to its involvement.



Incident management

During FY23, The Star further developed its grievance and incident management process with the introduction of a Head of Incident, Breaches & Whistleblower Governance and Whistleblowing and Breach Management team.

Grievances, incidents, or potential adverse impacts are raised by team members or suppliers and their employees via the whistleblowing, breach reporting or employee relations channels and are managed through the breach or whistleblowing process, investigations, people and performance or legal teams.

Where matters involve potential modern slavery or labour exploitation incidents, the Group Manager Social Responsibility and Modern Slavery Working Group and relevant business managers are engaged and involved as required.

INTEGRATING FINDINGS AND TAKING ACTION

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

In FY23, reviews were undertaken with four cleaning/housekeeping contractors due to complaints from unions or whistleblowers. Although these complaints were not directly related to modern slavery, they raised concerns about labour exploitation, which is on the continuum of exploitation and a red flag for modern slavery.

Following the reviews, The Star no longer works with three of the contractors, and has agreed on remediation actions with the fourth.

Further outcomes of the reviews included improvements in the procurement and on-boarding process for the soft services supplier category, including additional modern slavery / labour rights questions with higher weightings, introducing pro-active reviews, and including labour rights discussions within regular performance reviews.

COMMUNICATING AND REPORTING

The Star communicates its activities and progress by providing public reporting through the Annual Modern Slavery Statement, Annual Report, Sustainability Report, and the UN Global Compact Network Annual Communication of Progress.

We aim to continue to improve our modern slavery program and reporting through attending industry events and forums, and reviewing published reports including Monash University Business School, Centre for Financial Studies, “Measuring Disclosure Quality of Modern Slavery Statements” (Dec 2021) and Australian Council of Superannuation Investors, “Moving from paper to practice: ASX200 reporting under Australia’s Modern Slavery Act” (July 2021)

STAKEHOLDER ENGAGEMENT

The Star is a participant of the UN Global Compact Network and takes part in the UN Global Compact Network Australia Community of Practice for Modern Slavery.

We also regularly participate in industry education sessions and online learning events which provide access to best-practice examples and lived experience from modern slavery survivors.

Modern Slavery Working Group

The Modern Slavery Working Group meets regularly to build our response to the risks of modern slavery in our operations and supply chain. The group helps to deliver on our commitments made in The Star Modern Slavery Statement and build plans for improvement. The group contains and is guided by senior leaders from within our procurement, supply chain, people and performance, operations, and social responsibility teams.

Training and Education

Raising awareness and skills among key team members such as Procurement Category Managers is an on-going aspect of The Star's modern slavery program. Modern slavery training is mandatory for our legal, procurement, social responsibility, and supply chain teams.

In FY23 we updated the on-line training module in line with the Global Slavery Index, and we are planning to conduct more detailed engagement with our teams and suppliers based on category specific risks.

The Modern Slavery Learning Module includes the following:

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

Board and Group Leadership Team engagement

In FY23 upon the conclusion of the reporting period, a modern slavery program update was provided to The Group Leadership Team and Board for information and discussion. The update included an overview of the recommendations following the statutory review into the Modern Slavery Act (Cth) 2018.

Whistleblowing and access to grievance mechanisms

The Star's "Raise It" campaign, Whistleblower Protection Policy and independent whistleblower service encourages team members, suppliers, and their employees to raise issues anonymously and in multiple languages via an external 1800 number and confidential online platform.

The Raise it campaign is regularly communicated throughout each of our properties, via communications channels and on the company intranet.

Information about our commitments to supporting the rights of employees and our suppliers and access to the whistleblower program is included in the induction training undertaken by all employees, as well as contractors entering The Star properties.

This ensures this important information is accessed by our team members, and contracted workers including cleaners, housekeepers, and contingent labour hires.

The Supplier Code of Conduct is available on The Star's corporate website and contains details of The Star's independent whistleblowing and integrity service, providing a mechanism for workers to raise concerns regarding working conditions.

In addition, suppliers are expected to have their own grievance mechanism process and support their employees to make anonymous reports. This is part of our Request for Tender or Proposal for key suppliers.

Supplier Engagement

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

Sustainability and social responsibility are a regular agenda item during supplier reviews and discussions.

As part of the tender process for vulnerable worker categories such as cleaning and housekeeping, in FY23 we expanded the questions and supplier engagement relating to labour rights and modern slavery. The Group Manager Social responsibility joined the Procurement team and supplier managers in the supplier engagement and consideration process for new suppliers in this category.

Working with Unions and freedom of association

The Star supports our team members to choose whether to join a union or employer association or to participate in industrial activities. Union representatives are invited to attend Team Member welcome days, and relevant unions are actively engaged with the Enterprise Bargaining process on behalf of their members.

Criterion 5: TRACKING EFFECTIVENESS

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

Training

During the reporting period, 38 team members in the procurement, supply chain, legal and social responsibility teams were required to undertake modern slavery training, with 100% completion.

Due to a prioritisation on training relating to remediation activities, Modern Slavery Training was not provided to all staff on a voluntary basis as it has been in previous years.

Team member engagement

In FY23 team members proactively contacted the Group Manager Social Responsibility with questions or requests for supplier engagement regarding modern slavery risks. This demonstrates effectiveness in training and engagement in raising awareness and increasing involvement in understanding and addressing risks.

In the reporting period, the Modern Slavery Working Group met 5 times, and additional meetings were held with prospective suppliers for an ESG risk analysis and supplier engagement tool.

Supplier engagement

Of the 12 supplier questionnaires sent in FY23, 10 questionnaires were completed and returned, with one supplier no longer supplying for The Star. Suppliers were engaged throughout the questionnaire process to provide further information or answer queries as required.

Criterion 6: CONSULTATION WITH ENTITIES OWNED OR CONTROLLED

The Star operates in Australia through The Star Sydney, The Star Gold Coast and Treasury Brisbane. These entities, as well as controlled entities detailed in the FY23 Annual Report, operate under the governance of The Star Entertainment Group Board and in accordance with The Star’s policies, therefore no separate consultation was required when preparing this Statement.

The Star manages the Gold Coast Convention and Exhibition Centre on behalf of the Queensland Government, and has investments in strategic joint ventures including, but not limited to Destination Brisbane Consortium and Destination Gold Coast Consortium. Consultation in relation to the procurement of goods and services with these entities is informal and ongoing.

Criterion 7: OTHER RELEVANT INFORMATION

The Star endeavours to develop and implement programs that build capability over time so that we can contribute to addressing the global issue of modern slavery which is complex and far-reaching.

Key milestones and plans for future development include:

2020	Ethical Sourcing Policy approved by The Board
2021	Modern Slavery Working Group established. Modern Slavery training introduced. Clauses related to modern slavery and the right to audit included in all supplier contracts and purchase orders. Questions relating to modern slavery risks included in the tender process for key suppliers. 78% of direct suppliers analysed for modern slavery risks. Self-assessment questionnaires conducted with higher risk suppliers
2022	99% of direct suppliers analysed for modern slavery risks. Modern Slavery training updated. New independent whistleblowing hotline and reporting platform introduced. Membership of Cleaning Accountability Framework (CAF) Self-assessment questionnaires conducted with higher risk suppliers.
2023	Modern Slavery Risk Matrix created. Audits on 4 cleaning companies undertaken. Strategic Action Plan created for soft services (cleaning/housekeeping),with tender process reviewed and updated. Self-assessment questionnaires conducted with higher risk suppliers.

2024 and beyond

In addition to on-going actions to assess and address modern slavery risks outlined in this Statement, The Star will, in future reporting periods look to:

- Conduct category specific team member and supplier engagement, training, and education
 - Combine and uplift 'Ethical Sourcing Policy' and "Procurement Policy" to create "Responsible Procurement Policy" and update 'Supplier Code of Conduct'.
 - Improve visibility in extended supply chain, supplier engagement and reporting with online tool.
 - Review and update modern slavery contract clauses to reflect best practice approach.
 - Utilise available resources from UNGCNA and Attorney General's Department to educate SMEs on modern slavery and human rights via email and on the company website.
-

This statement was approved by the Board of The Star Entertainment Group Limited on 8 December 2023

Signed



Robbie Cooke
Group CEO | Managing Director

Registered Office

Level 3, 159 William Street, Brisbane QLD 4000

Property Locations

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

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

Treasury Brisbane: 130 William Street, Brisbane Queensland 4001

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

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

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