

ARISTOCRAT TECHNOLOGIES EUROPE LIMITED SLAVERY AND HUMAN TRAFFICKING STATEMENT

Aristocrat Technologies Europe Limited (“ATEL” or the “Company”) has published this slavery and human trafficking statement (the “Statement”) for the financial year ending 30 September 2019 in accordance with Section 54 of the U.K. Modern Slavery Act 2015.

ATEL first became subject to the Section 54 transparency requirement in the financial year ending 30 September 2017, and this is only the third slavery and human trafficking statement published by the Company. This Statement therefore reflects and describes several recent and ongoing efforts by ATEL and its affiliates to identify, mitigate and monitor modern slavery and human trafficking risks, in addition to measures that were already in force during the financial year ending 30 September 2019.

This Statement has been prepared in the midst of the ongoing Covid-19 pandemic. Aristocrat Group is evaluating whether the pandemic could alter the modern slavery and human trafficking risk profile of its business and supply chain, and, if necessary, will address this issue in its next annual statement, which will cover the financial year ending 30 September 2020.

Our Business, Organization and Structure

The Company’s principal activities are the assembly, marketing and sale or rental of electronic gaming machines and related equipment and services. All of the Company’s customers are in Europe, the Middle East and Africa.

ATEL is incorporated as a limited liability company in the United Kingdom. ATEL has one direct subsidiary, Aristocrat Technologies Spain S.L., which is incorporated in Spain. ATEL is also registered and operating in Cyprus under its own name (registered as an Overseas Company).

The Company is an indirect subsidiary of Aristocrat Leisure Limited (“ALL”), a company incorporated in New South Wales, Australia. ALL is listed on the Australian Securities Exchange.

In this Statement, we refer collectively to ALL and its global subsidiaries, including ATEL, as “Aristocrat Group”.

Our Workers and Supply Chain

During the financial year ending 30 September 2019, the Company and its subsidiary had 73 workers. Almost 86 per cent of the workers were full-time or part-time permanent employees of the Company and its subsidiary; the remaining workers were contingent workers, including temporary, agency or contracted workers.

In the same period, almost 84 per cent of the permanent and contingent workers of the Company and its subsidiary were based in the United Kingdom and Spain. The Company and its subsidiary did not have any employees in territories identified as having the highest prevalence of modern slavery and human trafficking in the [Global Slavery Index 2018](#).

ATEL directly and indirectly sources the components for electronic gaming machines and related equipment from the Aristocrat Group supply chain. The largest Aristocrat Group suppliers by value are located in North America, Australia and East Asia. Aristocrat Group’s key supplier relationships are relatively stable, and there are no seasonal fluctuations in supplier relationships. None of the major suppliers are located in territories identified as

having the highest prevalence of modern slavery and human trafficking in the Global Slavery Index 2018.

Our Values and Policies

ATEL requires all employees to abide by applicable laws and high standards of ethical conduct, and ATEL employees are subject to the Aristocrat Group Global Employee Handbook and Code of Conduct. Aristocrat Group imposes similar expectations upon its suppliers.

Since the Company published its last slavery and human trafficking statement for the financial year ending 30 September 2018, Aristocrat Group has implemented:

- a new version of its [Global Employee Handbook and Code of Conduct](#);
- an entirely new Anti-Modern Slavery and Human Trafficking Policy; and
- an entirely new [Supplier Code of Conduct](#).

In summary, the new version of the Global Employee Handbook and Code of Conduct:

- expressly confirms Aristocrat Group's commitment to ethical sourcing and the prevention of worker exploitation, including the prohibition of modern slavery and human trafficking in its business and global supply chain; and
- commits Aristocrat Group to adhering to all applicable laws that relate to countering modern slavery and human trafficking.

These new provisions supplement earlier versions of the Global Employee Handbook and Code of Conduct that:

- required and continue to require Aristocrat Group employees to refrain from inappropriate, insulting, intimidating, violent, abusive, demeaning or bullying conduct towards others; and
- required and continue to require Aristocrat Group to take all reasonable precautions to provide workplaces that are safe and healthy, such as compliance with all health and safety procedures applicable at Aristocrat Group's workplaces.

The new Anti-Modern Slavery and Human Trafficking Policy:

- explains the concepts of modern slavery and human trafficking in layperson's terms, without referring to specific legislative provisions;
- imposes a "zero tolerance" approach for modern slavery and human trafficking within Aristocrat Group's business and supply chain;
- requires Aristocrat Group directors, officers and employees to report actual or suspected modern slavery and human trafficking to GM Group Sustainability; and
- identifies several potential indicators of slavery and human trafficking to which Aristocrat 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.

The new Supplier Code of Conduct articulates Aristocrat Group's expectations for suppliers and sub-suppliers with respect to modern slavery and human trafficking, as well as several other labour, health and safety, and environmental standards. In several respects, the Supplier Code of Conduct requires suppliers to exceed minimum local legal standards, and to commit to using their best efforts to meet several aspirational standards by 31 December 2021.

As explained in the Company's prior statement, all of these new materials were developed by a cross-disciplinary team over a period of several months, including representatives of ATEL and other Aristocrat Group entities in the United Kingdom and Australia, as well as members of the Aristocrat Group legal, supply chain, people and culture and corporate responsibility teams. Aristocrat Group also took advice from external counsel in the United Kingdom and Australia regarding these matters.

The Anti-Modern Slavery and Human Trafficking Policy will be reviewed by GM Group Sustainability at regular intervals. These reviews will include an assessment and evaluation of the effectiveness of the Policy, as well as any procedures or practices relating to the implementation of the Policy. More frequent reviews may be conducted if merited by changes in legal or regulatory requirements, or emerging best practices for ethical sourcing.

More recently, a cross-disciplinary team within Aristocrat Group has been working with external counsel to develop employee training programmes to:

- explain the key concepts of modern slavery and human trafficking;
- familiarize employees with the requirements set out in the materials described above; and
- enable employees to identify and appropriately respond to the common warning signs that can indicate heightened modern slavery and human trafficking risks.

These employee training programmes have two elements:

- an introductory training session that will be delivered to all employees via video and followed by a self-assessment questionnaire; and
- a series of more detailed scenario-based training sessions that will be delivered via video to employees who have particular responsibility for engaging and monitoring suppliers and employees who have particular responsibility for hiring staff.

Although the implementation of these training programmes has been delayed due to the ongoing Covid-19 outbreak, Aristocrat Group is aiming to begin delivering the introductory training sessions by the end of the current calendar year, and to begin delivering the detailed scenario-based training sessions during the next calendar year.

Aristocrat Group continues to maintain confidential telephone and website reporting services that provide a channel for employees to anonymously and confidentially report potential misconduct, including breaches of Aristocrat Group policies and procedures, discriminatory treatment, harassment and bullying, workplace safety standards, and other types of improper behaviour. Breaches of the new standards set out in the Global Employee Handbook and Code of Conduct, the Anti-Modern Slavery and Human Trafficking Policy, or the Supplier Code of Conduct may be reported to GM Group Sustainability in the first instance, or using the same telephone and website reporting services.

Our Approach to Identifying, Mitigating and Monitoring Supply Chain Risk

Aristocrat Group's global supply chain team has responsibility for supplier management. A supplier due diligence assessment is required for all new and current suppliers to which a significant volume of Aristocrat Group business may be awarded.

The specific nature of the due diligence undertaken for each supplier has evolved over time to reflect emerging best practices regarding procurement and supply chain management.

Where deficiencies or areas for improvement are identified by Aristocrat Group personnel, Aristocrat Group and the relevant supplier will develop and agree to a time-limited corrective action plan, identifying the accountable supplier personnel for ensuring that the corrective action plan is implemented. If any supplier fails to meet the requirements of a corrective action plan, Aristocrat Group may take steps to wind down its relationship with that supplier, at all times taking into account the importance of protecting workers.

Aristocrat Group's global supply chain team also conducts periodic audits to monitor suppliers. Such audits are conducted in a risk-based manner, with a focus on the major suppliers that account for a significant majority of Aristocrat Group's business. Although the ongoing Covid-19 outbreak has prevented the global supply chain team from conducting on-site supplier audit visits for several months, the team intends to resume the regular programme of on-site visits when government guidance allows and travel restrictions are lifted.

Since the Company published its slavery and human trafficking statement for the financial year ending 30 September 2018, Aristocrat Group has taken several additional measures to improve its understanding and oversight of direct and indirect suppliers. In particular, Aristocrat Group has:

- updated all template supplier agreements to include new ethical sourcing provisions that address modern slavery, human trafficking, and other ethical sourcing standards;
- communicated the new Supplier Code of Conduct to existing material suppliers; and
- requested that suppliers within Aristocrat's supplier base which operate in territories that are reported to have a higher prevalence of modern slavery and human trafficking complete a Supplier Survey, which is intended to allow Aristocrat Group to better understand:
 - the nature of the goods or services provided to Aristocrat Group;
 - the nature of the workforce involved in providing goods or services to Aristocrat Group;
 - practices relating to employment agreements, work breaks, holidays, remuneration, and benefits;
 - the steps taken to prevent use of child labour, forced or bonded labour, harsh and inhumane treatment, or discrimination;
 - the recognition of, and participation in, labour unions or similar collective representation bodies;
 - the management of sub-suppliers; and

- any history of investigations or enforcement actions regarding modern slavery, human trafficking, or similar issues.

A further group of suppliers, which operate in territories that are reported to have a lower prevalence of modern slavery and human trafficking, will be asked to complete the Supplier Survey later during the current calendar year. To ensure that Aristocrat Group's resources remain focused on the suppliers that are likely to present the greatest relative risk, the final groups of suppliers will be asked to complete the Supplier Survey in the next calendar year.

Where necessary, Aristocrat Group intends to use Supplier Survey responses to develop and agree time-limited remediation plans with any suppliers that do not currently meet the expectations set out in the Supplier Code of Conduct.

All of the foregoing measures apply to ATEL and its subsidiary, as well as to the broader Aristocrat Group.

Looking ahead, Aristocrat Group has developed a roadmap for future improvements to its risk mitigation measures, including:

- introducing a model template corrective action plan, which will assist the global supply chain team to negotiate and agree appropriate plans with suppliers; and
- developing a plan to implement ethical sourcing provisions in other key supplier agreements in a risk-based manner.

However, as a consequence of the operational disruption caused by the global Covid-19 outbreak, the proposed deadlines for implementing some of these future improvements have been deferred until the next calendar year.

In the future, Aristocrat Group will keep its roadmap under periodic review, in order to consider whether additional risk mitigation measures are required and, if so, to establish a timeline for the implementation of those measures.

Assessing Our Effectiveness in Mitigating Slavery and Human Trafficking Risks

Aristocrat Group intends to continue monitoring the effectiveness of its approach to mitigating slavery and human trafficking risks based on the following key performance indicators, which were first set out last year:

- **Employee training and awareness.** The percentage of Aristocrat Group employees in supplier-facing roles who have received training regarding the Anti-Modern Slavery and Human Trafficking Policy, the Supplier Code of Conduct, and the ethical sourcing contractual safeguards.
- **Consistent application of Supplier Code of Conduct and the ethical sourcing contractual safeguards.** The percentage of the Aristocrat Group suppliers that are signatories to the ethical sourcing contractual safeguards, or otherwise subject to the Supplier Code of Conduct.
- **Prompt remediation of critical issues.** The percentage of the Company's suppliers with one or more critical issues during the financial year that remediated their respective critical issues within two weeks or less.

Aristocrat Group intends to periodically review the key performance indicators listed above to determine whether they continue to represent appropriate criteria for measuring the effectiveness of Aristocrat Group's efforts to mitigate slavery and human trafficking risks.

Statement of Approval

This Statement has been approved by the board of directors of the Company, and the board has authorized James Boje, a director of the Company and Managing Director (EMEA) for Aristocrat Group, to sign the Statement on behalf of the Company.

A handwritten signature in black ink, appearing to read 'J. Boje', with a stylized flourish at the end.

Signed:

Name: James Boje

Job Title: Director, Aristocrat Technologies Europe Limited
Managing Director (EMEA), Aristocrat Group

Date: 08 July 2020