

## **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 2017 in accordance with Section 54 of the U.K. Modern Slavery Act 2015.

The Company first became subject to the transparency obligation under Section 54 during the financial year ending 30 September 2017. Accordingly, this Statement only addresses the steps taken by the Company to prevent slavery and human trafficking during that financial year. However, as a consequence of the Company becoming subject to the U.K. Modern Slavery Act 2015 — as well as recent equivalent legislation in Australia, where the Company’s ultimate parent entity is headquartered — the Company and other entities within the wider corporate group have since taken additional measures to assess and address slavery and human trafficking risks, some of which are still in progress.

Several of the additional measures that have been or are being implemented are described in the Statement below. In light of those additional measures, and in accordance with the guidance issued by the U.K. Government, the Company intends to ensure that its future statements reflect the evolution and improvement of the Company’s slavery and human trafficking compliance program over time, as well as applicable best practices.

### **Our Business, Organization and Structure**

ATEL’s principal activities are the assembly, marketing and sale of electronic gaming machines and related equipment and services.

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 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 Supply Chain**

ATEL directly and indirectly sources the components for electronic gaming machines and related equipment from the global Aristocrat Group supply chain. The largest Aristocrat Group suppliers by value are located in North America, Australia, and East Asia.

### **Our Policies and Procedures**

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. We take a “zero tolerance” approach to breaches of our policies and procedures, as well as the laws that govern how we operate.

The Global Employee Handbook and Code of Conduct requires that Aristocrat Group employees must refrain from any inappropriate, insulting, intimidating, violent, abusive, demeaning or bullying conduct towards others. This requirement also extends to certain outside vendors and other professionals providing services to Aristocrat Group.

In addition, the Global Employee Handbook and Code of Conduct requires Aristocrat Group to take all reasonable precautions to provide workplaces that are safe and healthy. Among other things, we require compliance with all health and safety policies and procedures applicable at our work locations, and employees must report any accidents, injuries, illnesses, or unsafe or unhealthy conditions on our premises.

In some instances, contractors must also comply with Aristocrat Group's safety policies and procedures. For example, certain contractors must present job hazard identification, job safety analysis, and work method statements prior to applying for a permit to work.

Aristocrat Group maintains confidential telephone and website services that provide a channel for employees to anonymously or confidentially report potential misconduct, such as:

- breaches of Aristocrat Group's policies and procedures;
- discrimination;
- harassment and bullying;
- workplace safety hazards; and
- other types of unethical behavior.

#### **Our Approach to Identifying, Mitigating and Monitoring Supply Chain Risk**

The Aristocrat Group has a global supply chain team that 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. For example, the current version of the supplier due diligence assessment includes several questions that are relevant to identifying and evaluating slavery and human trafficking risks, including questions with respect to:

- the use of contracted workers or other sub-suppliers;
- the availability of manpower to support increased business or order volumes;
- the recognition of labor union representation;
- compliance with regulations relating to child labor, forced labor, health and safety, working hours, compensation, freedom of association and collective bargaining, and abuse;
- the availability of employee reporting and whistleblowing policies; and
- protection against fire and other hazards.

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.

In addition, Aristocrat Group's global supply chain team 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 supplies.


## Our Future Approach to Assessing and Addressing Slavery and Human Trafficking Risks

With the support of a cross-disciplinary, international team, Aristocrat Group is currently working to conduct a global supply chain mapping exercise. The purpose of the exercise is to identify the supplier territories that potentially present the greatest risks of human trafficking and slavery, to use this data to develop and implement further risk-based enhancements to Aristocrat Group's supply chain risk management tools, and to identify appropriate performance indicators to evaluate the success of Aristocrat Group's anti-slavery and human trafficking compliance program.

In addition, Aristocrat Group is currently developing revisions to the Global Employee Handbook and Code of Conduct, as well as a Slavery and Human Trafficking Policy, to ensure that employees, suppliers and others are aware of Aristocrat Group's standards and expectations. Aristocrat Group expects to implement these changes within the next 12 months. Once implemented, the changes will apply throughout Aristocrat Group, including at ATEL and its Spanish subsidiary, and training will be provided to personnel in a risk-based manner.

### 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.

Signed:  \_\_\_\_\_

Name: James Boje

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

Date: 18/07/2019