



MODERN SLAVERY STATEMENT

Aristocrat Australian Reporting Entities

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

Reporting Year: 1

Reporting Period: 1 October 2019 – 30 September 2020

Type of statement: joint statement

Aristocrat Technologies Europe Limited (ATEL)

Legislation: U.K. Modern Slavery Act 2015 (U.K. Modern Slavery Act)

Reporting Year: 4

Reporting Period: 1 October 2019 – 30 September 2020

Type of statement: voluntary statement

FOREWORD

FROM THE CHAIRMAN AND CEO



“Good Business. Good Citizen” is a core value shared across Aristocrat’s diverse global operations. This value shapes everything we do as a business, including our commitment to ethical sourcing and the prevention of all forms of worker exploitation. We take a zero-tolerance approach to modern slavery and human trafficking, and take very seriously our obligations to identify, mitigate and monitor these risks in our operations and supply chains.

We acknowledge that modern slavery and human trafficking are complex global problems that present risks to all businesses and require ongoing diligence and continuous improvement to address.

Aristocrat welcomes the introduction of the Australian Modern Slavery Act. For some years now we have reported under the U.K. Modern Slavery Act and more recently have also formalised a coordinated, enterprise-wide approach to this complex issue.

This Modern Slavery Statement reflects and describes several recent and ongoing efforts by the Group 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 2020.

Aristocrat is committed to ensuring that working conditions in its operations and supply chains are safe, and that all workers are treated with respect and dignity. This means that we also require that business operations are environmentally responsible and conducted ethically in line with applicable laws, and in a manner that meets community expectations.

The Group takes a prioritised, risk-based approach to managing risks. This means that, although many of the risk mitigation measures we have implemented or plan to implement apply on an enterprise-wide basis (with risk-based, “fit for purpose” adjustments where relevant), the focus of this Modern Slavery Statement is largely on our Gaming Business. This is the part of our operations and supply chain in which we believe we are likely to encounter the greatest modern slavery risks. As we make progress, we will move to address other potential risks, including risks in our Digital Business.

This Modern Slavery Statement has been prepared in the midst of the Covid-19 pandemic. We continue to closely monitor our modern slavery risks in this context, and have reported on the impacts of the pandemic on our compliance program.

This Modern Slavery Statement has been approved by the relevant boards in accordance with the requirements under the Australian Modern Slavery Act and the U.K. Modern Slavery Act (see Section 8).

The significant progress the Group has made on these important issues during this reporting period reflects a cross-functional, multi-disciplinary approach to governance and compliance, led by a dedicated Modern Slavery Working Group and our Project Stakeholder Group. I want to thank these groups – and all Aristocrat people – for their diligence and support, as we continue to strive to uphold our responsibilities and values in all we do.

Yours sincerely,

DocuSigned by:

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NEIL CHATFIELD
Chairman

DocuSigned by:

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TREVOR CROKER
CEO and Managing Director

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WHO WE ARE

- 1.1** For the purpose of the Australian Modern Slavery Act, this Modern Slavery Statement:
- 1.1.1** is made in accordance with section 14 of the Australian Modern Slavery Act:
 - (a)** as a joint modern slavery statement; and
 - (b)** is given by Aristocrat Leisure Limited (**Aristocrat**) to cover each of the reporting entities set out in **Attachment A**, which includes Aristocrat (each an **Aristocrat Australian Reporting Entity** and together the **Aristocrat Australian Reporting Entities**);
 - 1.1.2** covers the reporting period from 1 October 2019 to 30 September 2020 (**Financial Year 2020**); and
 - 1.1.3** covers all of the seven mandatory criteria for reporting as set out in section 16 of the Australian Modern Slavery Act.
- 1.2** For the purpose of the U.K. Modern Slavery Act, this Modern Slavery Statement is provided voluntarily by Aristocrat Technologies Europe Limited (**ATEL**).
- 1.3** For Financial Year 2020, ATEL did not meet the threshold for reporting and submitting a statement as required under Section 54 of that Act, although ATEL met this threshold for each of the previous 3 years.
- 1.4** However, ATEL is providing this Modern Slavery Statement on a voluntary basis to document ATEL's year-on-year progress.
- 1.5** In this Modern Slavery Statement, we refer collectively to Aristocrat and its global subsidiaries, including the Aristocrat Australian Reporting Entities and ATEL as the **Group, Aristocrat** (where applicable), **us, our** or **we**.
- 1.6** Not all entities in the Group have reporting obligations (including Group entities which operate in the United States of America, Canada, Mexico, Israel, Russia, Ukraine, Macau, the Philippines and Singapore). 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 (except as expressly stated below including with respect to the ongoing Digital Business risk assessment).
- 1.7** Aristocrat welcomes guidance issued by the Australian and U.K. Governments including:
- 1.7.1** the 'Commonwealth Modern Slavery Act 2018 – Guidance for Reporting Entities' published by the Australian Government (**Commonwealth Guidance**);
 - 1.7.2** the 'Modern Slavery Act Information Sheet' published by the Australian Government (**Covid-19 Guidance**); and
 - 1.7.3** the U.K. Government's statutory guidance, "Transparency in supply chains: a practical guide" (20 April 2020),
(together the **Government Guidance**),
and we have used this Government Guidance, where appropriate, to help draft this Modern Slavery Statement and inform our approach.

WHAT WE DO

OUR STRUCTURE, OPERATIONS, BUSINESS AND SUPPLY CHAIN

2.1 OUR STRUCTURE

2.1.1 ARISTOCRAT

- (a) Aristocrat is the ultimate parent company for the Group. Aristocrat is a company incorporated in New South Wales and is listed on the Australian Securities Exchange (ASX: ALL).
- (b) Aristocrat is a leading gaming provider and games publisher, with more than 6,000 employees globally (employed by subsidiaries of Aristocrat).
- (c) Aristocrat (via the Group entities) has offices and employees located around the world (see below taken from the Operating and Financial Review Section of our 2020 Annual Report).
- (d) For the purpose of the Australian Modern Slavery Act, Aristocrat owns or controls a number of entities which make up the Group.

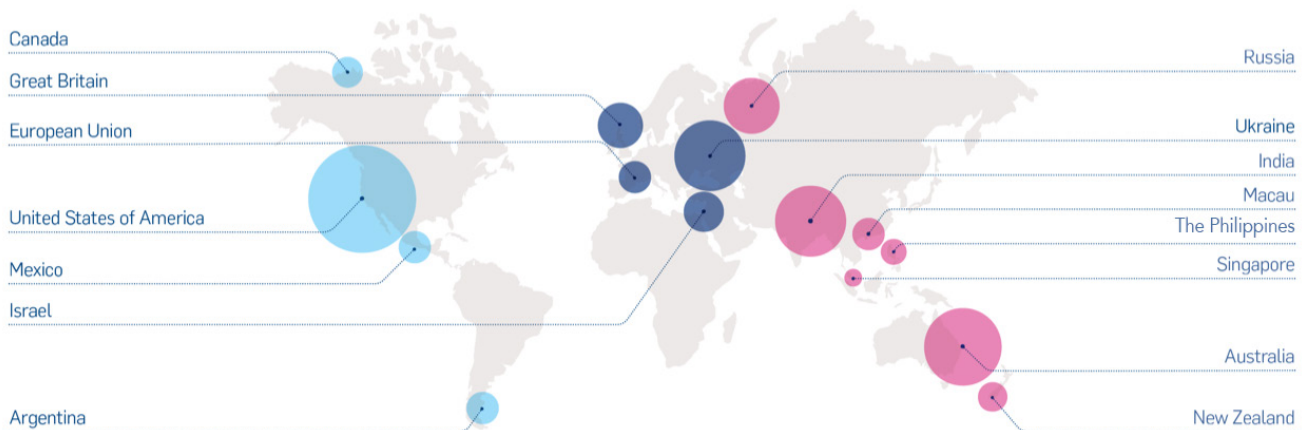
Countries

84

Employees

6,000+

The world map below displays the location of Aristocrat's employees, with the size of each circle illustrating the relative number of employees based in that country.



2.1.2 ARISTOCRAT AUSTRALIAN REPORTING ENTITIES (OTHER THAN ARISTOCRAT)

Each Aristocrat Australian Reporting Entity:

- (a) is incorporated as a proprietary limited company in Australia;
- (b) owns or controls a number of subsidiaries which form part of the Group; and
- (c) is either a direct or indirect subsidiary of Aristocrat.

WHAT WE DO

OUR STRUCTURE, OPERATIONS, BUSINESS AND SUPPLY CHAIN

2.1.3 ATEL

- (a) 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).
- (b) ATEL is an indirect subsidiary of Aristocrat.

2.2 OUR OPERATIONS AND BUSINESS

- 2.2.1 Aristocrat has its corporate headquarters in North Ryde, Sydney, Australia.
- 2.2.2 Globally, Aristocrat (via entities in the Group) offers a diverse range of products and services including electronic gaming machines, casino management systems and digital social games.
- 2.2.3 Aristocrat's mission is to 'bring joy to life through the power of play.'
- 2.2.4 For more information about our business objectives and strategy, please refer to our [2020 Annual Report](#).

(a) GAMING BUSINESS

- (i) The Group's gaming products are approved for use in approximately 300 licensed jurisdictions and are available in over 80 countries around the world.
- (ii) The Group does not manufacture gaming machines; we only integrate (assemble) machines and systems in Australia, the USA, Macau, and the U.K. via local entities in the Group, including ATEL (in the U.K.) and the Aristocrat Australian Reporting Entities (in Australia).
- (iii) The Group's Gaming Business operations also include the Video Gaming Technologies Inc. (VGT) business. VGT is a leading developer, manufacturer and distributor of Class II (Native American bingo-based gaming) casino games in North America.

(b) DIGITAL BUSINESS

Aristocrat's operations (conducted by Group entities) include the digital business segment which includes businesses which operate under the following brands:

- (i) **Product Madness**, a global social casino style video game developer;
- (ii) **Big Fish**, a global video game developer publishing games including social casino style games, free-to-play social games and premium paid games; and
- (iii) **Plarium**, a free-to-play, mobile and web-based game developer, headquartered in Israel, (together referred to as the **Digital Business**).

Much of our work thus far as part of our prioritised risk based approach has been identifying enterprise-wide risks. The Group plans to map and identify the modern slavery risks in the Digital Business during the financial year ending 30 September 2021 (**Financial Year 2021**) as part of our continuous improvement plan.

WHAT WE DO

OUR STRUCTURE, OPERATIONS, BUSINESS AND SUPPLY CHAIN

(c) MORE ABOUT THE ARISTOCRAT AUSTRALIAN REPORTING ENTITIES – INCLUDING OUR WORKERS

- (i) Of the Aristocrat Australian Reporting Entities, Aristocrat, Aristocrat International Pty Ltd and System 7000 Pty Ltd are holding companies only and do not carry out operations themselves. Aristocrat Technologies Australia Pty Limited is the only operational entity.
- (ii) Aristocrat Technologies Australia Pty Limited's principal activities include the assembly, marketing and sale of electronic gaming machines and related equipment and services predominantly in Australia. This includes at our integration facility located in Sydney, Australia for assembly and final configuration of electronic gaming machines.
- (iii) Some of the Aristocrat Australian Reporting Entities also own or control other Group entities which carry out similar activities in different jurisdictions. See the map in Section 2.1.1(d) for general Group locations and where workers are located.
- (iv) Some of the Aristocrat Australian Reporting Entities:
 - are heavily involved in research and development at our corporate offices in Sydney; or
 - provide back-end functions to the other Group entities.
- (v) During the Financial Year 2020, the Aristocrat Australian Reporting Entities had approximately 863 workers. About 95 per cent of the workers were full-time or part-time permanent employees of an Aristocrat Australian Reporting Entity; the remaining workers were contingent workers, including temporary, agency or contracted workers.
- (vi) In the same period, about 99 per cent of the permanent and contingent workers of the Aristocrat Australian Reporting Entities were based in Australia.
- (vii) Some of the Aristocrat Australian Reporting Entities also own or control Group entities based in other locations which employ workers. Again, the map in Section 2.1.1(d) provides general information about the locations and size of our Group workforce.

(d) MORE ABOUT ATEL – INCLUDING OUR WORKERS

- (i) ATEL's principal activities are the assembly, marketing and sale of electronic gaming machines and related equipment and services. ATEL does business in, or has permanent and contingent workforce residing in, the U.K., Spain, Cyprus, France, the Netherlands, Germany the Czech Republic, Bulgaria, Croatia and South Africa Its operations do not include the Digital Business or VGT.
- (ii) During the Financial Year 2020, ATEL and its subsidiary had 73 workers. Almost 86 per cent of the workers were full-time or part-time permanent employees of ATEL and its subsidiary; the remaining workers were contingent workers, including temporary, agency or contracted workers.
- (iii) In the same period, almost 84 per cent of the permanent and contingent workers of ATEL and its subsidiary were based in the U.K. and Spain.

WHAT WE DO

OUR STRUCTURE, OPERATIONS, BUSINESS AND SUPPLY CHAIN

(e) CHARITIES

- (i) Aristocrat facilitates regional fundraising, sponsorship and volunteer initiatives throughout the year under the banner of "AristocratCARES".
- (ii) Teams in each region are comprised of local employees who are passionate about contributing to their community. These teams are provided with a budget, and they take the lead in identifying and supporting causes and charities under the guidance of our Community Involvement Committees. Further information regarding these initiatives is available [here](#).

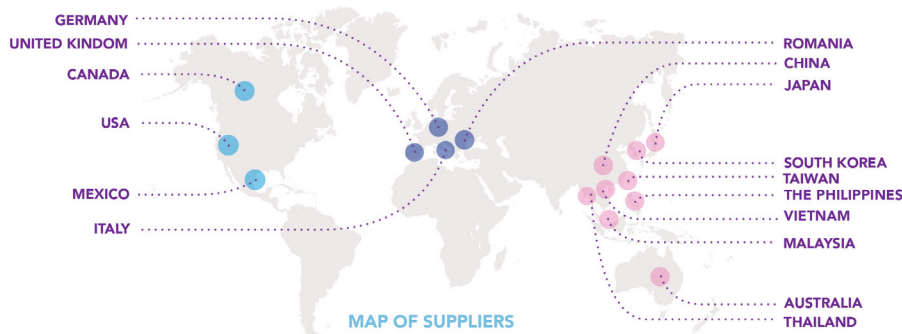
2.3 OUR SUPPLY CHAINS

2.3.1 SUPPLY CHAINS IN RELATION TO CORE ARISTOCRAT PRODUCTS

2.3.2 Like many global entities, our supply chain is diverse and complex.

2.3.3 However, in relation to our Gaming Business:

- (a) we acquire core products from a significantly smaller set of suppliers;
- (b) typically around 90 per cent of our spend for our Gaming Business comes from approximately 22 key direct suppliers;
- (c) the largest Group suppliers by value are located in North America, Australia and East Asia (see map below which illustrates where our key direct suppliers are located);
- (d) the Group's key direct supplier relationships are relatively stable, and there are no seasonal fluctuations in these key direct supplier relationships; and
- (e) none of the key direct suppliers are located in territories identified as having the highest prevalence of modern slavery and human trafficking in the Global Slavery Index 2018.



2.3.4 For their operations and business, ATEL and various Aristocrat Australian Reporting Entities directly and indirectly source the components for electronic gaming machines and related equipment from the Group supply chain.

2.3.5 For the Gaming Business, the Group's suppliers also include sub-suppliers. For example, entities which make up the supply chain of Aristocrat's key direct suppliers and provide specified components or subcomponents to those key direct suppliers.

2.3.6 To support both the Gaming Business and the Digital Business, the Group engages a range of other suppliers who supply goods or services that are not integrated or used in our gaming products and these are suppliers from whom we purchase goods or services relating to, for example, travel, technology, utilities, facility management, learning and development, marketing, professional services and more (**Indirect Procurement**).

2.3.7 Taking a prioritised risk based approach, the Group has focused on its key direct suppliers in relation to its Gaming Business in this Modern Slavery Statement. In future years, we intend to focus on the Digital Business and later Indirect Procurement.

THE RISKS OF MODERN SLAVERY

IN OUR OPERATIONS AND SUPPLY CHAINS

3.1 INTRODUCTION

- 3.1.1** In this Section we identify the 'risks of modern slavery practices', meaning the potential for the Group to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains.
- 3.1.2** In Financial Year 2020, we did not identify any specific instances of modern slavery in our operations or supply chain.
- 3.1.3** However, we were able to identify risk factors or indicators which allow us to focus on the higher risk areas of potential modern slavery in our operations and supply chains.
- 3.1.4** Again, our focus has been on the risks of our Gaming Business. This is the area we have identified as our biggest priority, and where the greatest risk of modern slavery within our supply chain has been determined to arise.
- 3.1.5** This Section 3 identifies the specific steps we have taken to identify those risks as well as the nature of the risks we have identified.
- 3.1.6** Section 4 provides an overview of how we manage these risks we have identified more broadly.

3.2 RISKS IN OUR OPERATIONS

Aristocrat 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.

As we are taking a prioritised risk based approach, the focus of our risk assessment has largely been on risks within our supply chain (as discussed below). In line with our roadmap, once we have dealt with these supply chain risks, we plan to move onto other risks we have identified.

3.3 RISKS IN OUR SUPPLY CHAIN



- 3.3.1** The Group has identified three broad categories of supply chain risk: (a) industry, sector and product risk; (b) geographic risk; and (c) risks of restricted worker freedoms and poor working conditions. All of these risk categories are considered in further detail below:

THE RISKS OF MODERN SLAVERY

IN OUR OPERATIONS AND SUPPLY CHAINS

(a) INDUSTRY, SECTOR AND PRODUCT RISK:

The Group first identified suppliers of electronic components to the Gaming Business as a key potential area of risk, on the basis that modern slavery has been publicly reported to be prevalent in many electronics factories, particularly in Asia. Electronic component suppliers also represent a significant proportion of the total spending of the Gaming Business on goods suppliers in each financial year.

(b) GEOGRAPHIC RISK:

Second, the Group identified the top 20 suppliers of electronic components to the Gaming Business by value and manufacturing location. Through this exercise, the Group confirmed that none of the material electronic component suppliers to the Gaming Business are located in territories that were identified in the Global Slavery Index 2018 as having the highest prevalence of modern slavery and human trafficking.

(c) RISKS OF RESTRICTED WORKER FREEDOMS AND POOR WORKING CONDITIONS:

Having considered potential sectoral and geographic risks, the Group developed a supplier survey to better identify specific modern slavery and human trafficking risks at the level of individual suppliers (the **Supplier Survey**). The Supplier Survey requests that suppliers provide detailed information to better allow the Group to understand (among other things):

- (i) the nature of the goods or services provided to the Group, including the locations where those goods or services are provided;
 - (ii) the composition of the suppliers' workforces, including the extent to which the suppliers rely on temporary employees, agency workers or consultants;
 - (iii) the extent to which the suppliers are transparent with their workers about the terms and conditions of their employment, including their remuneration;
 - (iv) the extent to which suppliers take steps to mitigate risks of child labour, forced labour, or bonded labour within their own operations;
 - (v) the suppliers' approach to recognising labour unions or similar collective representative bodies;
 - (vi) the adequacy of the suppliers' policies and procedures relating to modern slavery, human trafficking and related workers' rights issues, including the extent to which the suppliers have in place management systems and controls for their own suppliers (i.e. the Group's sub-suppliers); and
 - (vii) whether any of the suppliers have previously been subject to investigations, allegations or enforcement actions concerning child labour, forced labour, bonded labour, physical abuse or discipline, threats of abuse, verbal abuse, harassment, other forms of intimidation, discrimination, violation of employment standards or similar issues.
- (d) The Group has taken a risk-based approach to the implementation of the Supplier Survey.
- (e) For example, the early tranches of the Supplier Survey, which the Group started to implement in Financial Year 2020, included suppliers that primarily manufacture or source electronic components in relatively higher-risk countries such as China, the Philippines, Thailand, Malaysia and Vietnam.
- (f) Later tranches of the Supplier Survey will be implemented in Financial Year 2021, and will focus on suppliers that primarily manufacture or source electronic components in relatively lower-risk countries such as Australia, Taiwan, South Korea, Mexico, Europe and North America.

THE RISKS OF MODERN SLAVERY

IN OUR OPERATIONS AND SUPPLY CHAINS

- (g)** In the course of implementing the Supplier Survey, the Group has had regard to the emerging risks concerning the use of Uyghur forced labour in Xinjiang and other regions of China. In light of these emerging risks, the Group has updated its Supplier Survey to include further questions to ascertain:

 - (i)** whether any goods supplied to the Group, or any raw materials or components used in those goods, are directly or indirectly sourced, processed, manufactured, packaged, or distributed in the Xinjiang region or other regions of China in which forced or compulsory Uyghur labour may be used; and
 - (ii)** if so, what steps suppliers are taking, if any, to ensure that those goods, raw materials, or components are not sourced, processed, manufactured, packaged or distributed in reliance on forced or compulsory Uyghur labour, including prison labour.
- (h)** To date, the Group has not identified any key direct suppliers that are known to operate in Xinjiang.
- (i)** The Group is continuing to review and evaluate Supplier Survey responses from key direct suppliers in connection with its Gaming Business. At the conclusion of this exercise Aristocrat will consider:

 - (i)** whether individual suppliers should implement time-limited corrective action plans to address risks or control weaknesses that are identified in the supplier survey responses (and this process will be expedited if the Supplier Survey responses reveal any significant, high-priority risks, such as actual evidence of ongoing child labour or forced labour); and
 - (ii)** whether, in the aggregate, the Supplier Survey responses reveal any modern slavery and human trafficking risks that are generally applicable to the Group's supply chain.
- (j)** In the future, the Group will periodically review the modern slavery and human trafficking risk profile of its supply chain.
- (k)** In addition, during or following completion of the Supplier Survey for the Gaming Business, Aristocrat will begin to evaluate other areas of modern slavery and human trafficking risks, including potential risks relating to:

 - (i)** other parts of its business and operations, such as the Digital Business; and
 - (ii)** the provision of some services acquired as part of our Indirect Procurement (such as cleaning and maintenance services in Group offices).

THE ACTIONS TAKEN BY US

TO ASSESS AND ADDRESS THESE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

This Section describes the actions taken by the Group to assess and address the potential modern slavery risks in the Group operations and supply chains, including due diligence and remediation processes.

The focus of this Modern Slavery Statement has been on the risks in our supply chain for our core products for our Gaming Business, as these carry the highest risk.

The table below is an overview of the steps we have taken during this reporting period, informed by the Government Guidance, to assess and address the risks in our operations and supply chains, and the existing policies and processes we have in place that can be used to facilitate further risk assessment, prevention and mitigation.

OUR APPROACH TO IDENTIFYING, MITIGATING AND MONITORING SUPPLY CHAIN RISK

IDENTIFYING RISKS – SUPPLIER SURVEY

As discussed in Section 3.3, we have developed the Supplier Survey to specifically identify modern slavery risks in our operations and supply chain. We phased the release of the Supplier Survey based on geographic and social risk factors. The relatively higher risk phases have commenced, and the relatively lower-risk phases are planned for completion in 2021.

For more information regarding how the Supplier Survey identifies modern slavery risks and how it is being implemented, please refer to the detailed explanation in Section 3.3.

MITIGATING AND MONITORING SUPPLY CHAIN RISK

Supplier Self-Assessment Aristocrat's global supply chain team has responsibility for overall supplier management.

Separately from our Supplier Survey, as part of our standard procedures and onboarding process, a supplier due diligence assessment is required for all new and current suppliers to which a significant volume of 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.

This supplier due diligence assessment takes the form of a supplier self-assessment and covers a range of issues. The format of this supplier due diligence assessment will be updated to include more targeted questions regarding modern slavery and human trafficking. Key direct suppliers are required to undertake the supplier due diligence assessment on a regular basis (such as every 24 months).

Auditing via site visits or virtually Aristocrat's global supply chain team also conducts periodic audits to monitor suppliers. The purpose of these audits is to monitor for the matters identified in the supplier due diligence assessment.

THE ACTIONS TAKEN BY US

TO ASSESS AND ADDRESS THESE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

Such audits are conducted in a risk-based manner, with a focus on the major key direct suppliers that account for a significant majority of the Group's business.

Prior to the Covid-19 outbreak, these audits were conducted on-site. However, the ongoing Covid-19 pandemic has prevented the supplier audit visits for several months. Since March 2020, Aristocrat has instead been conducting this auditing process virtually.

Due to the impacts of the Covid-19 pandemic we have been in more regular contact with our key direct suppliers via virtual means. This included asking questions about the well-being of staff and arranging payment where we asked our suppliers to hold inventory.

The team intends to resume the regular programme of on-site visits when government guidance allows and travel restrictions are lifted.

All global supply chain team members and all other supplier-facing personnel are receiving training to ensure that they are familiar with common indicators of modern slavery and human trafficking that may become apparent during routine operational visits and interactions with supplier personnel. In addition, key members of Aristocrat's global supply chain and Design and Development teams will also be receiving additional customised training to assist with identifying potential modern slavery indicators. (For more information, refer to **"Internal Awareness, Education and Training"** section below).

OUR VALUES AND POLICIES

The Group requires all employees to abide by applicable laws and high standards of ethical conduct, and Group employees are subject to the Aristocrat Group Global Employee Handbook and Code of Conduct.

The Group imposes similar expectations upon its suppliers (which is explained in the Section below **"Engaging and Working with Suppliers"**).

From 2019 and during Financial Year 2020, the Aristocrat Group has:

- commenced implementation of a new version of its Global Employee Handbook and Code of Conduct;
- commenced implementation of an entirely new Anti-Modern Slavery and Human Trafficking Policy; and
- created modern slavery training for our staff (with a planned release for the Gaming Business and VGT in early 2021).

While these materials will be rolled out on an enterprise-wide basis, they may, in some cases, be amended or modified for different parts of the business to ensure they are 'fit for purpose' (e.g., to reflect organisational structures and reporting lines in different business segments).

THE ACTIONS TAKEN BY US

TO ASSESS AND ADDRESS THESE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

OUR VALUES AND POLICIES

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

- expressly confirms the 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 the 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 Group employees to refrain from inappropriate, insulting, intimidating, violent, abusive, demeaning or bullying conduct towards others; and
- required and continue to require the 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 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 the Group's business and supply chain;
- requires Group directors, officers and employees to report actual or suspected modern slavery and human trafficking to Director of Sourcing Compliance; and
- identifies several potential indicators of slavery and human trafficking 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.

The modern slavery internal **training, education and awareness program** is described in the next section below.

All of these new materials (together with the materials mentioned in the **"Engaging and Working with our Suppliers"** Section) were developed by a cross-disciplinary team over a period of several months, including representatives of ATEL, the Aristocrat Australian Reporting Entities and

THE ACTIONS TAKEN BY US

TO ASSESS AND ADDRESS THESE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

other Group entities globally, as well as members of the Group Legal, Global Supply Chain, People and Culture and Corporate Social Responsibility teams.

Aristocrat also took advice from external counsel in the U.K. and Australia regarding these matters.

The Anti-Modern Slavery and Human Trafficking Policy will be reviewed 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.

A cross-disciplinary team within Aristocrat worked with external counsel to develop employee training programmes to:

- explain the key concepts of modern slavery and human trafficking;
- familiarise 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.

Aristocrat plans to deliver the introductory training sessions in early 2021 and the detailed, scenario-based training sessions are intended to be delivered during the second half of 2021.

EMPLOYEE REPORTING SERVICE

Aristocrat 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 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 Director of Sourcing Compliance in the first instance, or using the same telephone and website reporting services.

INTERNAL AWARENESS, EDUCATION AND TRAINING

THE ACTIONS TAKEN BY US

TO ASSESS AND ADDRESS THESE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

BRINGING TOGETHER KEY AREAS OF OUR BUSINESS AND DEVELOPING A SPECIFIC ACTION PLAN

We have a clear modern slavery compliance roadmap. Our cross-disciplinary Modern Slavery Working Group meets on a regular basis to assign roles and responsibilities, delegate tasks, set milestones and track our progress.

We also have a cross-disciplinary Project Stakeholder Group which consists of stakeholders who provide feedback and approvals to the Modern Slavery Working Group.

Collectively, the Modern Slavery Working Group and the Project Stakeholder Group consist of stakeholders from different parts of the business, representing different functions and various jurisdictions (including representatives from Global Supply Chain, Corporate Social Responsibility, Legal, People and Culture, Health, Safety and Environment (HSE), Compliance and more). The Modern Slavery Working Group regularly communicates with the Project Stakeholder Group.

ENGAGEMENT FROM EXECUTIVES

Our executive leadership team is actively engaged with our modern slavery compliance strategy. Our Board and executive leadership team have received training and awareness raising sessions and the executive leadership team has also been involved in developing and approving the key enterprise wide policies and procedures we are implementing in this space.

Some have also been involved in developing video and other content and materials to promote our staff training and education program.

While our executive leadership team is highly engaged, our modern slavery compliance approach empowers all employees to be involved.

ENGAGING AND WORKING WITH OUR SUPPLIERS

Engaging and working with our suppliers is key to our modern slavery compliance program.

Our goal is to work with suppliers to improve conditions through communication, monitoring and follow-up assessments and we place an obligation on suppliers to cooperate with us to identify and mitigate sourcing risks and remediate potential violations in their supply chains.

In addition to the Supplier Survey and auditing and monitoring processes mentioned elsewhere in this Modern Slavery Statement, the Group has other key measures for communicating expectations with its suppliers.

These include the following:

SUPPLIER CODE OF CONDUCT

Our new Supplier Code of Conduct articulates the Group's expectations for key direct 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.

THE ACTIONS TAKEN BY US

TO ASSESS AND ADDRESS THESE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

ENGAGING AND WORKING WITH OUR SUPPLIERS

The Supplier Code of Conduct places obligations on suppliers based on the Australian Modern Slavery Act and the U.K. Modern Slavery Act, the Responsible Business Alliance Code of Conduct, and other international standards. Suppliers are required to adhere to the principles set out in the Supplier Code of Conduct and 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. At all times, our response to non-compliance will take into account the best interests of workers who may be the victims of poor conditions. In most instances, our preference will be to support suppliers to improve their standards over a reasonable period, rather than to terminate supplier relationships.

ETHICAL SOURCING CONTRACTUAL CLAUSES

To ensure our standards are met, and with a view to continuous improvement in the way we work with our suppliers, in 2019 we began updating our supply chain contracts to require suppliers to comply with all applicable Modern Slavery, Human Rights, Conflict Minerals and related laws. Contracts have been updated on a priority basis, with supplier criticality and contract duration being key considerations.

Throughout Financial Year 2020, we have updated these provisions in all precedent master supply agreements for our key direct Gaming suppliers, and incorporated additional requirements to reflect best business practices and legal developments. Updated provisions also include ethical sourcing and anti-bribery clauses. As part of our due diligence process, we are continually and actively communicating with suppliers regarding our requirements and monitoring their compliance with our agreements.

COMMUNICATING WITH KEY DIRECT SUPPLIERS

In Financial Year 2020 the Group wrote to its key direct suppliers to advise them of the introduction of our new Master Supply Agreement, with modern slavery and ethical sourcing clauses, our new Supplier Code of Conduct, and our Supplier Survey.

We reconfirmed our commitment to ensuring that working conditions in our operations and supply chains are safe, that all workers are treated with respect and dignity, and that business operations are environmentally responsible and conducted ethically.

4.1 LOOKING AHEAD – OUR FUTURE ROADMAP

Aristocrat has committed to the following measures as part of our next reporting period and is committed to continuous improvement. We will:

- 4.1.1** continue to periodically review the implementation of our new policies and procedures;
- 4.1.2** introduce ethical sourcing provisions in other agreements in a risk-based manner;

THE ACTIONS TAKEN BY US

TO ASSESS AND ADDRESS THESE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

- 4.1.3** continue to implement the Supplier Survey for lower-risk entities, review Supplier Survey responses, and consider remedial action plans where necessary;
- 4.1.4** implement our staff education and training;
- 4.1.5** build a complete risk profile for the Digital Business and VGT (as further described in section 6); and
- 4.1.6** work towards developing a template remediation plan to guide the Aristocrat response to specific supplier issues and ensure consistency to our approach to remediation.

ASSESSING THE EFFECTIVENESS OF OUR ACTIONS

- 5.1** Aristocrat intends to continue monitoring the effectiveness of its approach to mitigating modern slavery and human trafficking risks based on the following key performance indicators, which were first set out in 2019:
- 5.1.1 Employee training and awareness.** The percentage of 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.
 - 5.1.2 Consistent application of the Supplier Code of Conduct and the ethical sourcing contractual safeguards.** The percentage of the Group's key direct suppliers that are signatories to the ethical sourcing contractual safeguards or otherwise subject to the Supplier Code of Conduct.
 - 5.1.3 Prompt remediation of critical issues.** The percentage of the Group's key direct suppliers with one or more critical issues during the financial year that remediated their respective critical issues within two weeks or less.
- 5.2** Aristocrat 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's efforts to mitigate modern slavery and human trafficking risks.

OUR CONSULTATION PROCESS

- 6.1** While the Group is large, diverse and global, we take an enterprise wide approach to modern slavery compliance. Aristocrat is committed to developing and maintaining a robust, enterprise wide response to modern slavery.
- 6.2** All entities in the Group are required to comply with our policies and procedures in this space, which may be modified or localised to ensure they are “fit for purpose” based on specific business requirements, local laws and modern slavery risk profiles.
- 6.3** Aristocrat has also developed the Modern Slavery Working Group and the Project Stakeholder Group in order to consult, consider risks across the Group and communicate our expectations and raise awareness of our approach across the whole of the Group. For more information about the roles and responsibilities of the Modern Slavery Working Group and the Project Stakeholder Group, and how they facilitate a Group-wide approach and consultation, please see Section 4.
- 6.4** In terms of the Australian Modern Slavery Act, the consultation process between the Aristocrat Australian Reporting Entities and all entities which are owned or controlled by those Aristocrat Australian Reporting Entities, commenced early on and well before the commencement of the Australian Modern Slavery Act.
- 6.5** Our discussions surrounding modern slavery compliance began with an initial threshold assessment during Financial Year 2019 across the whole of the Group to identify those entities which may be captured by the Australian Modern Slavery Act.
- 6.6** We developed this joint Modern Slavery Statement in consultation with each of the four Aristocrat Australian Reporting Entities. The consultation process involved consideration of how modern slavery risks vary across the Group, implementation of a Group-wide risk assessment process which is being rolled out as outlined in Sections 3 and 4 and agreement on our future roadmap for the next reporting period as further described in Section 4.1.
- 6.7** In order to prepare this Modern Slavery Statement, Aristocrat also separately consulted with the wider Group. This included tailored communication with the Digital Business and VGT recognising the fact that the Digital Business and VGT are likely to have some differences to their risk profile when compared to the rest of the Gaming Business segments.
- 6.8** Building a complete risk profile for the Digital Business and VGT, and taking action to address that risk, is part of our planned activities for our next reporting year.
- 6.9** Aristocrat has asked the Digital Business and VGT to:
- 6.9.1** confirm whether the enterprise wide risk mitigation measures adopted by Aristocrat to date are acceptable to the Digital Business and VGT;
 - 6.9.2** conduct their own modern slavery and human trafficking risk assessment, in order to better understand the specific risk profile of their own operations and supply chains; and
 - 6.9.3** consider whether any of the risk mitigation measures adopted by Aristocrat to date should be modified or localised for the Digital Business and VGT.
- 6.10** We have also asked that the Digital Business and VGT continue to monitor at the start of each financial year whether the Digital Business and VGT trigger the application of either the Australian Modern Slavery Act or the U.K. Modern Slavery Act.

OTHER IMPORTANT INFORMATION

- 7.1** ATEL has been subject to the U.K. Modern Slavery Act for several years now and has filed 3 modern slavery statements to date under the U.K. Modern Slavery Act.
- 7.2** The introduction of the Australian Modern Slavery Act has seen Aristocrat invest heavily in both time and resources to continue to create a cohesive enterprise wide approach to modern slavery and human trafficking risks.
- 7.3** Our Modern Slavery Working Group has worked with modern slavery experts in both the U.K. and Australia. This has helped to develop and refine our approach.
- 7.4** We understand that the U.K. Government has proposed a series of changes to the U.K. Modern Slavery Act which are likely to have the effect of creating a greater degree of alignment between the key reporting and transparency requirements of the U.K. Modern Slavery Act and the Australian Modern Slavery Act.
- 7.5** As a global organisation, Aristocrat supports a greater alignment in reporting and transparency requirements.
- 7.6** We also know that the Modern Slavery Act 2018 (NSW) is currently not in force, but there is potential for this Act to be implemented. Aristocrat supports legislation which is clear and creates a streamlined approach between Commonwealth and State obligations. We continue to monitor developments with the Modern Slavery Act 2018 (NSW) with interest.

7.7 THE IMPACTS OF COVID-19

- 7.7.1** The Covid-19 Guidance expressly asks reporting entities to discuss the impacts of the Covid-19 pandemic on both modern slavery risks and compliance implementation.
- 7.7.2** As outlined in Section 4, the Covid-19 pandemic led to increased engagement and communication with our key direct suppliers.
- 7.7.3** As part of our business continuity process, we are continually engaging and communicating with our suppliers regarding their financial health and capacity to provide services and deliver our products on time and in a compliant manner.
- 7.7.4** The Covid-19 pandemic had a significant impact on our business, in particular our Gaming Business which was impacted by lockdowns. The impact of this meant that some of our planned modern slavery compliance activities have been delayed as our staff attention has been diverted. For example, our training program was intended to be implemented in Financial Year 2020, but instead, while the content has been created, the roll out and implementation will occur in Financial Year 2021.

7.8 GOVERNMENT RESOURCES AND KEY DEVELOPMENTS

- 7.8.1** The Group aims to review changes and developments in modern slavery and human trafficking laws and relevant guidance issued by Governments. This means that we regularly monitor:
- (a)** Government Guidance that may be issued in respect of compliance with the U.K. Modern Slavery Act and the Australian Modern Slavery Act;
 - (b)** potential developments in other jurisdictions, for example the potential for the Modern Slavery Act 2018 (NSW) to come into force;
 - (c)** laws, guidelines and news which relate to conflict minerals;
 - (d)** what others are doing in this space, so we might learn and continuously improve our approach; and

OTHER IMPORTANT INFORMATION

- (e) how the Australian Government itself is responding (for example, by reviewing the Australian Government's own Government procurement toolkit) so we can refine our approach, where appropriate.
- 7.8.2** We are aware that the Australian Government released modern slavery contractual clauses (after the end of our Financial Year 2020). Our Modern Slavery Working Group intends to review these with interest.
- 7.8.3** As part of our Financial Year 2020 activities, we also undertook a global review of all modern slavery and human trafficking reporting requirements to confirm which laws applied to us.

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 System 7000 Pty Ltd was approved by the Board of Aristocrat Leisure Limited as the parent entity on 25 February 2021 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:

DocuSigned by:

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Signature

Chairman
Feb 28, 2021
Date

DocuSigned by:

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Signature

CEO and Managing Director
Feb 26, 2021
Date

In accordance with section 54 of the U.K. Modern Slavery Act 2015, this Modern Slavery Statement was approved by the Board of **Aristocrat Technologies Europe Limited** on 4 March 2021, 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:

DocuSigned by:

FB400834110549E...
Signature

Craig Terence Toner
CFO and EVP Operations, Global Gaming
Mar 8, 2021
Date

ATTACHMENT A

ARISTOCRAT AUSTRALIAN REPORTING ENTITIES

NAME OF REPORTING ENTITY	ACN
Aristocrat Leisure Limited	002 818 368
Aristocrat International Pty Ltd	000 148 158
Aristocrat Technologies Australia Pty Limited	001 660 715
System 7000 Pty Ltd	605 116 783

ATTACHMENT B

- Aristocrat Technologies Europe Limited

ATTACHMENT C

ADDRESSING MANDATORY CRITERIA

The Table below helps illustrate where you can find the criteria for the Australian Modern Slavery Act and the U.K. Modern Slavery Act addressed in this Modern Slavery Statement.

SECTION IN MODERN SLAVERY STATEMENT	AUSTRALIAN MODERN SLAVERY ACT	U.K. MODERN SLAVERY ACT
SECTION 1 Who we are	A statement must identify the reporting entity (section 16(1)(a))	
SECTION 2 What we do – Our structure, operations, business 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))
SECTION 3 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))
SECTION 4 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))
SECTION 5 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))
SECTION 6 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))	

ATTACHMENT C

ADDRESSING MANDATORY CRITERIA

SECTION IN MODERN SLAVERY STATEMENT	AUSTRALIAN MODERN SLAVERY ACT	U.K. MODERN SLAVERY ACT
<p>SECTION 7 Other Important Information</p>	A statement must include any other information that the reporting entity, or the entity giving the statement, considers relevant (section 16(1)(g))	
<p>SECTION 8 Approval and signing</p>	For a joint modern slavery statement, the joint modern slavery statement must be approved and signed in accordance with one of the options set out in section 14(2).	For bodies corporate, a statement must be approved by the board of directors and signed by a director (section 54(6)(a))

