

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 2018 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 second slavery and human trafficking statement published by the Company. Accordingly, the Statement 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 2018.

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 the EMEA region.

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.

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 2018, the Company and its subsidiary had 58 workers. Almost 85 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 83 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 the top 10 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 global 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 top 10 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.

The version of the Global Employee Handbook and Code of Conduct that was in force during the financial year ending 30 September 2018 required that Aristocrat Group employees refrain from inappropriate, insulting, intimidating, violent, abusive, demeaning or bullying conduct towards others. This requirement also extended to certain outside vendors and other professionals providing services to Aristocrat Group.

In addition, the Global Employee Handbook and Code of Conduct required Aristocrat Group to take all reasonable precautions to provide workplaces that are safe and healthy. Among other things, it required compliance with all health and safety policies and procedures applicable at Aristocrat Group's workplaces, and employees were obliged to report any accidents, injuries, illnesses, or unsafe or unhealthy conditions on Aristocrat Group premises.

More recently, Aristocrat Group has developed and will soon implement new provisions in the Global Employee Handbook and Code of Conduct that:

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

In addition, Aristocrat Group has developed and will soon implement a new Anti-Modern Slavery and Human Trafficking Policy that, among other things:

- 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 or appearances, and geographic risk factors.

The Anti-Modern Slavery and Human Trafficking Policy will be reviewed by GM Group Sustainability at least every five years. 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.

The revisions to the Global Employee Handbook and Code of Conduct and the new Anti-Modern Slavery and Human Trafficking Policy were developed by a cross-disciplinary team, 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, and corporate responsibility teams. Aristocrat Group also took advice from external counsel in the United Kingdom and Australia regarding these matters.

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 hazards, and other types of improper behaviour. Breaches of the new standards set out in the Global Employee Handbook and Code of Conduct or in the Anti-Modern Slavery and Human Trafficking Policy may be reported 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. For example, the current version of the supplier due diligence assessment includes several questions relating to the identification and evaluation of modern 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 labour union representation;
- compliance with regulations relating to child labour, forced labour, 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.

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 supplies.

In addition, since the Company published its Slavery and Human Trafficking Statement for the financial year ending 30 September 2017, Aristocrat Group has taken several additional measures to improve its understanding and oversight of direct and indirect suppliers. In particular, Aristocrat Group has developed and will soon implement:

- new ethical sourcing contractual safeguards that, among other things, require key global supply chain suppliers to comply with modern slavery and other ethical sourcing laws, to report potential breaches of such laws to Aristocrat Group, and to allow

Aristocrat Group to review suppliers' records and visit suppliers' premises to monitor compliance;

- a new Supplier Code of Conduct that clearly 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; and
- a Supplier Survey that focuses on identifying the suppliers that potentially present the most significant modern slavery and human trafficking risks, based on a variety of measures, including:
 - 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.

Aristocrat Group intends to use the 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 will apply to ATEL and its subsidiary, as well as to the broader Aristocrat Group.

Assessing Our Effectiveness in Mitigating Slavery and Human Trafficking Risks

Going forward, Aristocrat Group intends to monitor the effectiveness of its approach to mitigating slavery and human trafficking risks on a global basis, based on the following key performance indicators:


- **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.

Signed:  _____

Name: James Boje

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

Date: 09 December 2019.