

GLOBAL WHISTLEBLOWER POLICY

REFERENCE

1.8.

EFFECTIVE DATE

June 2022

OWNER

Finance

1. WHAT IS THE PURPOSE OF THIS POLICY?

Aristocrat is committed to maintaining the highest standards of corporate governance. We have high expectations of our staff and have no tolerance for non-compliance with our values and breaches of the policies and procedures, laws and regulations that govern our operations.

In line with our values, including “Good Business, Good Citizen” and “Talent Unleashed”, we are committed to strong, transparent practices, that empower our people to speak up in the knowledge they will be listened to and have our trust and support.

An effective whistleblower program is a necessary element of good corporate governance. It assists in the detection of corrupt, illegal or other undesirable conduct.

The Global Whistleblower Policy (the Policy) is designed to:

- encourage people to raise concerns about Reportable Conduct (refer to Section 3 of this Policy for definition) knowing that their concerns will be taken seriously and investigated as appropriate;
- inform people that a framework exists to protect them from detrimental treatment which may be suffered by them as a result of raising a concern about Reportable Conduct; and
- outline how Aristocrat will respond to concerns raised under this Policy.

This Policy does not form part of any individual employment contract or terms and conditions of employment. Where it considers it is appropriate to do so, Aristocrat may depart from, replace, cancel or vary, this Policy from time to time in its absolute discretion.

Aristocrat operates in numerous locations globally and certain countries may have whistleblower related laws that affect the application of this Policy. A non-exhaustive summary of country-specific provisions that may affect the operation of this Policy is set out in the Attachments to this Policy. This Policy should be read in conjunction with the provisions applicable to the country in which a person is based and where there is an inconsistency between this Policy and an Attachment, the Attachment will prevail. This Policy does not permit conduct that would be unlawful, or prohibit conduct that would be permissible, in a certain country, as long as that conduct does not fall below the behavioural thresholds as defined within the core of this Policy, or result in a breach of any laws or regulations at a localised level.

2. WHO IS A DISCLOSER?

Under this Policy, a discloser is a current or past employee, officer, associate (i.e. director or secretary), contractor, or supplier (including an employee of a supplier) of Aristocrat who, anonymously or by name, raises concerns about suspected Reportable Conduct. A discloser can also be a relative or dependant of any of these people (or a dependent of a spouse of any of these people) who reports on suspected Reportable Conduct.

Anyone with information about suspected Reportable Conduct is encouraged to raise a concern.

3. WHAT CAN BE REPORTED UNDER THIS POLICY?

Reportable Conduct includes, but is not limited to, criminal activity (such as theft, fraud, dishonesty, corruption), illegality, a breach of law or regulation, miscarriages of justice, a serious breach of internal policy, discrimination, harassment, unethical or improper behaviour, workplace safety issues, bribery, conduct that endangers the public or the financial system, any other misconduct or improper state of affairs or circumstances in relation to an Aristocrat company, or any other conduct which may cause financial or non-financial loss to Aristocrat or otherwise be detrimental to the interests of Aristocrat and its customers, including environmentally unsound practices.

Reportable Conduct also includes a deliberate concealment of any conduct meeting the above description.

Suspected Reportable Conduct can be reported under this Policy. However, this Policy generally does not apply to personal work-related grievances.

Personal work-related grievances are grievances relating to the discloser's current or former employment or engagement that has implications for that person personally and does not otherwise fall within the scope of Reportable Conduct. For example, an interpersonal conflict between two staff members, or a decision relating to employment or engagement, such as a transfer, promotion or disciplinary action of the person. For such grievances, employees are encouraged to approach their supervisor, management or People and Culture (P&C) directly.

A personal work-related grievance may still be covered by this Policy in certain situations. See Attachment 1 for details.

Nothing in this Policy is intended to prohibit or discourage anyone from reporting perceived wrongdoing to any government agency or regulatory body.

4. MAKING A REPORT UNDER THIS POLICY

Aristocrat will make available at all times an independent communication channel for a discloser to report on suspected Reportable Conduct. Please refer to section 10 for guidance on how to make a report through the independent communication channel.

Reports are treated confidentially and can be made anonymously if a discloser does not want to reveal their identity. A discloser can continue to remain anonymous over the course of the investigation and after the investigation is finalised to the extent possible and permitted by relevant law. However, sometimes due to the nature of the information disclosed in a report, it may be possible to identify the discloser.

While a discloser is encouraged to provide his or her name because it will make it easier for Aristocrat to address the disclosure (for example, the context in which the discloser may have observed the Reportable Conduct is likely to be useful information), they are not required to do so.

If a discloser does not provide their name, Aristocrat will assess the content of the disclosure in the same way as if the discloser had revealed their identity, and any investigation will be conducted as is possible in the circumstances. However, an investigation may not be possible unless sufficient information is provided, and it may make it difficult to offer the discloser the same level of practical support if Aristocrat does not know their identity.

5. DISCLOSER'S IDENTITY

The priority at Aristocrat is to protect people who make disclosures about suspected Reportable Conduct. If a discloser makes a disclosure, their identity (and any information that we have because of the disclosure that someone could likely use to work out the person's identity) will only be disclosed if:

- the discloser gives consent for Aristocrat to disclose that information;
- the disclosure is allowed or required by law (for example, disclosure by Aristocrat to a lawyer to get legal advice relating to the law on whistleblowing); or
- in the case of information likely to identify the discloser, it is reasonably necessary to disclose the information for the purposes of an investigation, but all reasonable steps are taken to prevent someone from working out their identity.

If a discloser does not provide consent, this may limit Aristocrat's ability to progress the disclosure and take appropriate action.

6. RECEIPT OF REPORT

Reports made under this Policy will be received and treated sensitively and seriously. Suspected Reportable Conduct reported via the independent communication channel will be shared with one or more of the Group Head of Risk and Audit (GHRA), Chief Financial Officer, the Company Secretary (also Group Legal representative) and/or their respective delegates, provided that any report of suspected Reportable Conduct concerning any of these individuals will not be shared with the individuals concerned. In order to properly investigate a report, the report may need to be further shared with others, including external advisors or authorities, and will remain subject to confidentiality and other applicable restrictions.

Matters which do not amount to suspected Reportable Conduct will be dealt with through the normal channels in accordance with Aristocrat's policies and procedures.

7. RESPONSE AND INVESTIGATION

While making a report does not guarantee that the Reportable Conduct will be formally investigated, all reports will be assessed by Aristocrat and a decision made as to whether to investigate. Aristocrat will endeavour to contact a discloser, acknowledging the report, within one business day of receiving their disclosure.

Aristocrat's response to a report will vary depending on the nature and method of the disclosure (including the amount of information provided). If a disclosure does not include all relevant facts, there may be insufficient information to investigate the suspected Reportable Conduct.

Any investigations commenced will be conducted in a timely manner (as appropriate in the circumstances) and will be independent from any persons to whom the report relates. While timelines will vary depending on the particular investigation, Aristocrat endeavours to conclude investigations within four weeks of commencing the investigation. Investigations will generally be overseen by the GHRA. Other people, including employees or external advisers, may also be asked to assist or run the investigation.

All employees and contractors must cooperate fully with any investigations, and must maintain confidentiality over the proceedings at all times. Any breaches of confidentiality, will result in serious disciplinary actions being taken by the organisation.

Unless there are confidentiality or other reasons not to do so, persons to whom the disclosure relates will be informed of the concerns at an appropriate time, and will be given a chance to respond to concerns raised against them. Any response provided will be considered by Aristocrat for the purposes of making any findings as part of any investigation.

Investigations into suspected Reportable Conduct may conclude with a formal report from the GHRA or the investigator (as applicable, including any external investigator), which may include findings on the allegations. The report is confidential and the property of Aristocrat. Findings will be made on the balance of probabilities based on the evidence available and will be recorded as substantiated, partly substantiated, not substantiated or unable to be substantiated.

Aristocrat does not assume any liability to inform disclosers of the progress of Aristocrat's response or any investigation but, where appropriate to do so, disclosers will be told how Aristocrat has decided to respond to their disclosure, including whether an investigation will be conducted. Aristocrat will also endeavour to provide disclosers with regular updates of the status of any investigation and findings, if appropriate. However, it may not always be appropriate to provide disclosers with this information, and it may not be possible unless the discloser's contact details are provided when the report is made.

Any formal report from the GHRA or investigator (as applicable) will not be provided to a discloser or any person subject to investigation.

The Board Audit Committee receives appropriate summary information and metrics regarding Reportable Conduct disclosures made under this Global Whistleblower Policy (including the outcome of any investigation) on at least a quarterly basis.

8. HOW ARE DISCLOSERS PROTECTED?

Aristocrat is committed to protecting disclosers against actions taken against them for reporting genuinely suspected Reportable Conduct. This section outlines the measures which may be taken by Aristocrat to protect those who make a report.

a) Protecting Disclosers' Identities

Aristocrat will adopt measures as appropriate to protect a discloser's identity, which may include some or all of the following:

- using a pseudonym in place of the discloser's name;
- if the discloser chooses to remain anonymous, communicating with the discloser through the anonymous avenues available through the independent communication channel;
- redacting personal information or references to the discloser;
- referring to the discloser in a gender-neutral context;

- where possible, consulting with the discloser to help identify the aspects of their disclosure that could inadvertently identify them;
- ensuring paper and electronic documents and other materials relating to disclosures are stored securely;
- limiting access to all information relating to a disclosure to those directly involved in managing and investigating the disclosure or who are directly involved in any other response to the disclosure;
- subject to the discloser's consent, only disclosing their identity or information that is likely to lead to their identification to a restricted number of people who are directly involved in handling and investigating the disclosure or who are directly involved in any other response to the disclosure;
- reminding each person who is involved in handling and investigating a disclosure about the confidentiality requirements, including the consequences of an unauthorised disclosure; and
- providing periodic training to "eligible recipients" and others involved in handling and investigating disclosures about the confidentiality requirements.

b) Protecting Disclosers from Detriment

Disclosers must not suffer any detrimental treatment as a result of raising a concern about Reportable Conduct. Detrimental treatment may include (but is not limited to) dismissal, threats or other unfavourable treatment due to raising a disclosure.

Aristocrat does not tolerate any reprisals, discrimination, harassment, intimidation or victimisation against a discloser, his or her colleagues or family members. Any retaliatory action may be treated as serious misconduct and will be dealt with in accordance with relevant legislation and Aristocrat's disciplinary procedures. An individual may also be exposed to criminal or civil liability for a breach of relevant legislation.

This does not prevent Aristocrat from raising and addressing with a discloser (who is an employee, officer, associate, contractor or supplier of Aristocrat) matters that arise in the ordinary course of their employment or contractual relationship (for example, any performance or conduct concerns) or taking appropriate action if a concern is raised which the discloser knows to be untrue.

c) Other Protections Available

Aristocrat may offer protections to a discloser at its discretion, depending on things such as the nature of the Reportable Conduct and the people involved. Protections may include the following, at Aristocrat's discretion:

- monitoring and managing the behaviour of other employees;
- offering relocation to individuals (which may include the people alleged to have been involved in the Reportable Conduct) to a different division, group or office; or
- offering an individual a leave of absence or flexible workplace arrangement while a matter is investigated.

Aristocrat will look for ways to support all people who make a report of genuinely suspected Reportable Conduct, but it will of course not be able to provide non-employees with the same type and level of support that it provides to employees. Where this Policy cannot be applied to non-employees, Aristocrat will still seek to offer as much support as reasonably practicable.

9. WHAT ARE THE RESPONSIBILITIES OF EMPLOYEES UNDER THIS POLICY

Workers

It is the responsibility of all Aristocrat employees, officers, associates and contractors to:

- Assist in any investigation resulting from a discloser's report, if requested.
- Protect the confidentiality of the discloser and any other witnesses referred to or involved, as required by applicable law and to the extent permitted by law.
- Take all reasonable steps to protect the discloser from any detrimental conduct as a result of the discloser having made a genuine disclosure of suspected Reportable Conduct.

Disclosers

When raising a concern, a discloser is expected to have reasonable grounds to suspect that the information they are disclosing is true and accurate to the best of their knowledge and belief. Where it is found that a discloser has knowingly made a false or malicious report, this will be considered a serious matter and may result in disciplinary action. There may also be legal consequences if a person knowingly makes a false report.

10. HOW TO MAKE A REPORT

Disclosers are strongly encouraged to take due care and exhaust internal escalation channels (EthicsPoint or internal Eligible Recipient), prior to communicating information regarding a disclosure externally. In particular, the discloser should strongly consider making a disclosure to Aristocrat in accordance with this Policy before communicating the matter to external parties, including the media or regulatory body.

Disclosures about suspected Reportable Conduct can be made through Aristocrat's Whistleblower Program, which can be accessed either through the dedicated EthicsPoint Hotline or EthicsPoint Web Intake Site, which are available 24 hours a day, 365 days a year.

EthicsPoint is a confidential, independent communication program provided by NAVEX Global, a third-party ethics and compliance specialist, contracted by Aristocrat.

EthicsPoint Website: www.aristocrat.ethicspoint.com

Dedicated EthicsPoint Phone Hotlines:

REGION	TOLL FREE NUMBER
Argentina	1-877-247-3532 (Spanish)
Australia	1-800-40-8934
Canada	1-877-247-3532 (French Canadian)
Finland	0800 416206
India	1-877-247-3532 (Hindi)
Israel	180-931-7130
Macau	1-877-247-3532 (Cantonese, Portuguese)
Mexico	001-877-388-9168 (Spanish) 1-877-247-3532 (Spanish)
New Zealand	1-877-247-3532
Philippines	1-877-247-3532 (Tagalog)
Poland	800005128
Puerto Rico	1-877-247-3532 (Spanish)

REGION	TOLL FREE NUMBER
Russia	499-951-6133
Spain	1-877-247-3532 (Spanish)
Ukraine	1-877-247-3532 (Ukrainian)
United Kingdom	1-877-247-3532
USA	1-877-247-3532
Other	1-877-247-3532

When an individual contacts the EthicsPoint Hotline or EthicsPoint Website they will be asked a series of questions to assist with the understanding of the suspected Reportable Conduct, including the location, timing and involved parties.

Suspected Reportable Conduct reported via the independent communication channel is notified to one or more of the GHRA, the CFO, the Company Secretary (also Group Legal representative) and/or their respective delegates, who will review the report and determine a course of action to respond, in accordance with applicable policies and procedures.

Acknowledgement that a report of suspected Reportable Conduct has been responded to will be provided on the EthicsPoint Website and may be accessed by the discloser. Additional information or consent required to fully investigate a report of suspected Reportable Conduct (if applicable) may also be requested by the GHRA from the discloser via the independent communication channel.

11. DATA PROTECTION

Disclosers may also be asked to acknowledge that Aristocrat may collect, use, store, transfer and otherwise process their personal data including providing personal data to third parties and transferring personal data within and outside the discloser's local employment region, in accordance with applicable data protection regulations.

Further details relating to the processing of such personal data are set out in Aristocrat's Privacy and Data Breach Policies, which are non-contractual and may be amended from time to time.

12. AVAILABILITY OF THIS POLICY AND TRAINING

Each employee (including new employees), will have this Policy made available to them and be provided with training about the Policy and their rights and obligations under it. Training will also be provided to individuals who receive reports about Reportable Conduct or otherwise have a role under this Policy, including in relation to how to respond to disclosures.

A copy of this Policy is available on Aristocrat's website and on the Aristocrat intranet within Policy Hub. This Policy will be periodically reviewed to ensure that it is operating effectively and to identify if any changes are required to the Policy.

Any questions about this Policy can be referred to the GHRA.

ATTACHMENT 1: AUSTRALIA

1.0 WHEN LEGISLATIVE PROTECTIONS MAY APPLY

Under Australian law (in particular, the *Corporations Act 2001* (Cth)) (**Act**), legislative protections are available to certain persons (including current and former employees, officers, and suppliers (including their employees), as well as their relatives and dependants of those individuals) who make a "protected disclosure" to certain people.

Aristocrat encourages people to make a disclosure in accordance with its Policy, as set out above. However, the law offers the same protections if a person makes a "protected disclosure" to the people identified in this Attachment, or to certain other persons. Details of those persons to whom a "protected disclosure" can be made are set out in Section 2 below.

Further details of some specific protections and remedies available to those who make a "protected disclosure" are set out in Section 3 below.

Please contact Aristocrat's Company Secretary or GHRA for more information about making a disclosure and the protections available under the law.

2.0 PROTECTED DISCLOSURES

To qualify for protection under the Act, a "protected disclosure" must relate to a "disclosable matter" and be made to an "eligible recipient" whose role it is to receive protected disclosures under the Act. A disclosure can still qualify for protection even if it turns out to be incorrect or is unsubstantiated. Examples of this type of information and recipients are outlined in the following table:

INFORMATION REPORTED OR DISCLOSED	RECIPIENT OF DISCLOSED INFORMATION
<ul style="list-style-type: none"> Information about misconduct, or an improper state of affairs or circumstances in relation to Aristocrat or a related body corporate. Information that Aristocrat, a related body corporate or any officer or employee of such entities has engaged in conduct that: <ul style="list-style-type: none"> contravenes or constitutes an offence against certain legislation (e.g. the Corporations Act); represents a danger to the public or the financial system; or constitutes an offence against any law of the Commonwealth that is punishable by imprisonment for a period of 12 months or more. <p>Note that "personal work-related grievances" are not protected disclosures under the law.</p>	<ul style="list-style-type: none"> A person authorised by Aristocrat to receive protected disclosures under this Policy. An officer or senior manager* of Aristocrat or of a related body corporate. An auditor, or a member of an audit team conducting an audit, of Aristocrat or of a related body corporate. An actuary of Aristocrat or of a related body corporate. ASIC or APRA. A legal practitioner for the purposes of obtaining legal advice or legal representation (even if the legal practitioner concludes the disclosure does not relate to a disclosable matter).

*Aristocrat considers a **senior manager** to mean Executive Steering Committee (ESC) members and Managing Directors or Presidents within Business Units (at the date of the Policy being Online RMG, Gaming and Pixel United).

Personal work-related grievances

Legal protection for disclosures about solely personal employment related matters are only available under the law in limited circumstances. A disclosure of a personal work-related grievance will remain protected if it relates to:

- detriment that has been suffered or is threatened because an individual has raised a concern about suspected Reportable Conduct;
- both a personal work-related grievance and other misconduct under this Policy; or
- concerns that Aristocrat has breached employment or other laws punishable by imprisonment for a period of 12 months or more.

Emergency and public interest disclosures

The law also protects certain disclosures made in "emergency" and "public interest" situations, in which case disclosures can be made to journalists** or Parliamentarians.

However, prior to taking such action, it is strongly encouraged the discloser exhaust all internal escalation channels available. In particular, the Discloser should strongly consider the following options before outside communication:

- utilising EthicsPoint, the independent communication channel to make the disclosure, allowing the organisation to respond in accordance with this Policy; or
- reporting the suspected Reportable Conduct to an "eligible recipient", allowing the organisation to respond in accordance with this Policy.

It is important for a discloser to understand the criteria for making a public interest or emergency disclosure before doing so. For example, a discloser should be aware that to qualify for protection as a public interest or emergency disclosure:

- a disclosure must have previously been made to ASIC, APRA or another prescribed regulatory body and written notice provided to them of the intention to make a public interest or emergency disclosure;
- in the case of a public interest disclosure, at least 90 days must have passed since the previous disclosure was made and the discloser must have reasonable grounds to believe that making a further disclosure is in the public interest; and
- in the case of an emergency disclosure, the discloser must have reasonable grounds to believe that the information concerns a substantial and imminent danger to the health and safety of a person or the natural environment.

These criteria are not exhaustive, and a discloser should contact an independent legal adviser before making an emergency or public interest disclosure.

****A journalist** is a person who is working in a professional capacity as a journalist for:

- a newspaper or magazine;
- a radio or television broadcasting service; or
- an electronic service (including a service provided through the internet) that is operated on a commercial basis or by a national broadcasting service and is similar to a newspaper, magazine or radio or television broadcast.

3.0 SPECIFIC PROTECTIONS AND REMEDIES

If a person makes a "protected disclosure", the law provides:

- it is illegal for a person to identify the discloser, or disclose information that is likely to lead to the identification of the discloser, except in certain circumstances (Refer to Section 5 of the Policy: Discloser's Identity);
- the person is not subject to any civil, criminal or administrative liability for making the disclosure;
- no contractual or other remedy may be enforced or exercised against the person on the basis of the disclosure;
- in some circumstances (e.g. if the disclosure has been made to a regulator), the information the person provides is not admissible in evidence against the person in criminal proceedings or in proceedings for the imposition of a penalty, other than proceedings in respect of the falsity of the information; and
- the person is protected from detrimental acts or omissions in relation to making the disclosure and can seek compensation and other remedies through the Courts if they suffer loss, damage or injury because of a disclosure and Aristocrat has failed to take reasonable precautions and exercise due diligence to prevent the detrimental conduct.

Additional legislative protections and remedies may also be available.

ATTACHMENT 2: UNITED KINGDOM

Protections under UK law

Only employees and workers are afforded statutory protection under The Public Interest Disclosure Act 1998 (**PIDA**). They are protected by law from being detrimentally treated for making a "*protected disclosure*" under the PIDA. The dismissal of a whistleblower who is an employee will be automatically unfair if the reason, or principal reason, for their dismissal is that they have made a "*protected disclosure*".

Protected disclosures

A "*protected disclosure*" is a disclosure of information, for which the employee or worker has a reasonable belief, that such disclosure is about:

- a breach of a legal obligation;
- criminal activity;
- miscarriages of justice;
- health and safety breaches;
- damage to the environment; and
- the deliberate concealing of information about any of the above.

Further, the employee or worker must have a reasonable belief that the disclosure is in the public interest.

When should the whistleblower program be used?

If a discloser suspects "Reportable Conduct" (as defined in the Global Whistleblower Policy), they are encouraged to use the independent communication channel set out in the Global Whistleblower Policy. However, in some cases, it may be appropriate for the discloser to raise concerns with someone else within the organisation, either in person or in writing. The law recognises that in some circumstances it may be appropriate for a discloser to report their concerns to an external body such as a regulator. It will very rarely ever be appropriate to alert the media. Disclosers are strongly encouraged to seek advice before reporting a concern to anyone externally.

Reporting disclosures to the authorities

The relevant Aristocrat entities in the UK may, depending on the circumstances, choose to make a disclosure to a relevant authority as it sees fit, and nothing in the Global Whistleblower Policy will override this.

Disciplinary processes

Notwithstanding the Global Whistleblower Policy, a person who is the subject of disciplinary proceedings as a result of any disclosure made, may be provided with the relevant information from the disclosure/ report to enable them to participate fairly in such proceedings. The subject of the disciplinary proceedings may be provided with all of or part of the report which will be dependent on the allegations against them and their ability to properly state their case.

ATTACHMENT 3: RUSSIA

In Russia, the provision of the last paragraph of section 1 of the Policy which reads as follows:

"This Policy does not form part of any individual employment contract or terms and conditions of *employment*. Where it considers appropriate to do so, Aristocrat may depart from, or vary, this Policy from time to time in its absolute discretion."

shall be substituted with the provision which reads as follows:

"This Policy shall be implemented in the relevant Aristocrat entity in Russia by way of an internal regulation being issued and the employees being made acquaint with it."

ATTACHMENT 4: NEW ZEALAND

Discloser's identity

The main protection for a discloser under the Protected Disclosures Act 2000 (NZ) is confidentiality, rather than anonymity as set out in the policy. The person receiving a protected disclosure must use their “best endeavours” not to disclose information that would identify the discloser. There are limited exceptions to this obligation where:

- the discloser consents in writing; or
- Aristocrat reasonably believes that disclosure of identifying information is essential:
 - for the effective investigation of allegations;
 - to prevent serious risk to public health or safety, or to the environment; or
 - to comply with the principles of natural justice.

Once confidentiality is lost, Aristocrat is not obliged to consult the discloser about the potential loss of confidentiality, to provide advance notice, nor to advise that their identity has been disclosed.