

SKYCITY ENTERTAINMENT GROUP LIMITED

CODE OF BUSINESS PRACTICE LAST REVIEWED APRIL 2018

1. General

- 1.1 As part of our vision to create fun and entertainment and our mission to be the most popular entertainment and leisure destination in the cities in which we operate, SKYCITY recognises its responsibilities as a corporate citizen. This Code of Business Practice is intended to reinforce our commitment to the community, including our employees and shareholders. The Code sets out many of the business practices already followed by the SKYCITY Entertainment Group. It includes the standards of behaviour that the community can expect from us.
- 1.2 At all times we expect our directors, employees and contractors to practice high ethical standards in the performance of their duties, comply with all applicable laws and regulations, co-operate with regulatory bodies and government agencies, and use SKYCITY's assets and resources only for the legitimate and ethical achievement of SKYCITY's business objectives.

2. Purpose and Intent

- 2.1 The purpose and intent of this Code of Business Practice is
- to guide directors, employees, contractors and representatives of SKYCITY so that their business conduct is consistent with SKYCITY's business standards; and
 - to improve the understanding of our business standards by our customers, our staff, our shareholders and the communities in which we operate.

3. Business Practices

3.1 Compliance with Laws

- We conduct our business in accordance with all applicable laws and legal requirements, and at all times comply with the terms of our casino venue and casino operator's licences.
- SKYCITY co-operates with regulatory bodies and government agencies in all matters, including their investigations of our compliance with our legal obligations.
- The company co-operates at all times with Police and regulatory agencies in respect of illegal or criminal behaviour or activity and also in terms of undesirable or inappropriate behaviour or activity, including but not limited to loan sharking and money laundering. The company adopts a proactive approach and will move to exclude patrons associated with such activities. Some activities are noted as not necessarily illegal or unlawful but if deemed undesirable or inappropriate in the casino context, appropriate response and preventative actions will nevertheless be initiated on a timely basis.

3.2 **Honesty and Fairness**

- We deal with all customers and employees in an open, honest and fair manner. We respond promptly to all customer or employee complaints or issues and co-operate with all relevant regulatory bodies in investigating any of those issues.

3.3 **Human Rights**

- SKYCITY has adopted and follows policies and business practices that provide fair and equal opportunities to all employees and customers.
- We have adopted and follow human resource policies that respect the rights and individual differences of all employees and customers. SKYCITY does not discriminate against any person on the basis of one of the prohibited grounds of discrimination set out in the Human Rights Act or any other legislation. We do not accept any form of harassment by, or of, employees or customers.

3.4 **Health & Safety**

- We provide a safe environment in which our customers can enjoy themselves and our employees can carry out their responsibilities. We seek to ensure our facilities are operated and maintained to the highest standard. We operate an appropriate hazard identification and management programme, and we will ensure our employees must observe and practice safe work methods.

3.5 **Privacy and Confidentiality**

- SKYCITY respects the privacy of its employees, customers and their guests and the confidentiality of all information they give to us. We provide training to our employees on the principles of the Privacy Act and have implemented a Privacy Act compliance programme.
- We make every effort to prevent disclosure of confidential information we receive from other people as part of our business.
- Company employees are bound by confidentiality obligations which contract them, as a term of their employment with the company, to at all times protect the company's commercial and confidential information and not to disclose commercially sensitive company information to external persons.

3.6 **Insider Trading**

- No director or employee (or former director or employee) of the company who has non-public information which could affect the price of the company's securities may buy or sell SKYCITY shares or other SKYCITY voting securities. Directors and employees must at all times comply with the company's Securities Trading policy. No director or employee with such non-public price-sensitive information may recommend or suggest other persons buy or sell or hold our securities.

3.7 **Conflicts of Interest**

- SKYCITY expects its directors and employees to avoid conflicts of interest in their decisions and to avoid any direct or indirect interest, investment, association, or relationship which is likely to, or appears to, interfere with the exercise of their independent judgement.
- No director or executive shall, without the prior written consent of the Chairperson of the Board or (where the person seeking consent is the

Chairperson of the Board) the deputy chairperson of the Board or the Chairperson of the Audit and Risk Committee

- grant security over his or her shares in the company
- enter into any margin loan or similar instrument in respect of such shares
- enter into any hedging arrangements which reduce the risk elements essential to effective employee incentive schemes.

3.8 Bribes and Favours

- We will not seek to gain an advantage through the improper use of business courtesies or other inducements. SKYCITY does not offer, give, solicit or accept any form of bribe including substantial or excessive gifts, entertainment or favours. Except for normal complimentaries and entertainment for customers and key suppliers, directors and employees do not offer or make gifts or extend favours either directly or indirectly to those with whom we do business or might have a business relationship in the future.
- Directors and employees may not accept any commission or personal profit or rebate for any business arrangement involving SKYCITY. No director, employee or a member of their immediate family may accept gifts, entertainment or other favours where acceptance could be seen to influence a business decision. This does not apply to complimentaries, entertainment and hospitality activities which are normal in a business context.

3.9 Competition

- We only use legitimate resources, enquiries and business practices while collecting data on and competing with our competitors, and we do not act in a way that is illegal, unethical or otherwise inappropriate.

3.10 Promotion and Advertising

- SKYCITY does not promote or market itself in a way that will mislead or deceive customers. All statements we make about the goods and services we provide must be accurate and complete. Our advertising and promotions must comply with applicable advertising standards and legislation.
- SKYCITY promotes the range of entertainment experiences available at its sites, including gaming activities, in a responsible manner. We do not market our gaming activities to those who are under the legal age for entry to a casino.

3.11 Community Contributions

- SKYCITY plays a positive role in the community by assisting and contributing to community organisations and community projects.

3.12 Problem Gambling

- We do not endorse or encourage gambling by those who show signs of having a gambling problem. SKYCITY promotes the availability of assistance and treatment from service providers in the community to its customers. We proactively assist persons who request help to obtain counselling and treatment for problem gambling, and encourage such persons to use the self-exclusion programme. We actively support the prevention and treatment of problem gambling in association with service providers in the community.

- SKYCITY ensures its employees are trained in the identification of, and provision of assistance to, customers with gambling problems.

3.13 **Service of Alcohol**

- We promote the socially appropriate consumption of alcohol. In this regard, SKYCITY discourages the excessive consumption of alcohol and will ensure its staff are trained to encourage customers not to consume alcohol to excess and not to drink and drive. We will use our best endeavours to prevent under-aged customers consuming alcohol on our premises and ensure our staff are trained to deal with under-aged customers.

4. Written Policies

- 4.1 SKYCITY may from time to time institute written policies and authorities that support this Code of Business Practice and provide directors, employees and contractors with guidance on the conduct required to comply with this Code.

5. Clarification

- 5.1 SKYCITY expects its directors, employees and contractors to comply with the spirit as well as the letter of this Code of Business Practice.

6. Compliance and Monitoring

- 6.1 Compliance with this Code of Business Practice is monitored through education and notification by individuals who become aware of any breach. Relevant senior executives are asked annually to provide confirmation that, to the best of their knowledge, all business matters undertaken within their areas of responsibility have been conducted in accordance with this Code of Business Practice.
- 6.2 Any SKYCITY director or employee who becomes aware of any breach of this Code of Business Practice, or the policies and authorities that support this Code of Business Practice, has a responsibility to report that breach to the Chairman of the Board (in the case of directors (other than the Chairman)), the Deputy Chairman (if there is one) or Chairman of the Audit and Risk Committee (if there is not) in the case of a breach by the Chairman of the Board, or his/her manager (in the case of employees).
- 6.3 Any person who is found to be in breach of this Code of Business Practice, or the policies and authorities that support this Code of Business Practice, will face disciplinary action in accordance with SKYCITY's disciplinary procedures.
- 6.4 SKYCITY also has internal procedures in place whereby fraudulent activities are investigated by Security & Surveillance and reported to the Internal Audit and Risk team. Details of such activities are entered in the Internal Audit and Risk's Fraud Register and, where appropriate, are reported to the Audit and Risk Committee.

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