

SKYCITY ENTERTAINMENT GROUP LIMITED

CODE OF CONDUCT LAST REVIEWED AUGUST 2019

1. General

- 1.1 Our vision is to be the leader in gaming, entertainment and hospitality in our communities. For SkyCity, it is important to be a responsible business, whilst operating a sustainable and successful business model.
- 1.2 We expect our directors and employees to practise high ethical standards in the performance of their roles, comply with all applicable laws and regulations, co-operate with regulatory bodies and government agencies, and use SkyCity's assets and resources for legitimate and ethical purposes in support of SkyCity's operations.

2. Purpose and Intent

- 2.1 This Code:
- sets out our commitment to our communities and the principles and practices followed by the SkyCity Entertainment Group, including the standards of behaviour that our communities can expect from us; and
 - reflects the cornerstone principles of the SkyCity values - "**Own It** - Make your Mark", "**Share It** - Make a Difference" and "**Live It** - Make Magic".
- 2.2 SkyCity expects its directors and employees to comply with the spirit as well as the letter of this Code. For further information on this Code, contact your Human Resources Manager.

3. Our Principles and Practices

Compliance with Laws

- We conduct our business in accordance with all applicable laws and legal requirements, comply with the terms of our casino venue and casino operator's licences and co-operate with regulatory bodies and government agencies in all matters, including their investigations of our compliance with our legal obligations.
- We co-operate with Police and regulatory agencies in relation to illegal, undesirable or inappropriate criminal behaviour or activity (eg, loan sharking and money laundering) and proactively seek to exclude people associated with such activities. Some activities may not be illegal or unlawful, but could be deemed undesirable or inappropriate by SkyCity – in which case, we will initiate an appropriate response and preventative actions.

Honesty and Fairness

- We deal with all people in an open, honest and fair manner, respond promptly to complaints/issues and co-operate with all regulatory bodies investigating the same.

Human Rights

- We adopt and follow policies and practices that respect the rights and individual differences of, and provide fair and equal opportunities to, all.
- We do not discriminate against anyone on the basis of one of the prohibited grounds of discrimination under applicable legislation.
- We do not accept any form of harassment by, or of, employees or customers as outlined in the SkyCity Appropriate Workplace Behaviour Policy.

Diversity & Inclusion

- We value and respect the contributions, ideas and experiences of people from all backgrounds and provide a working environment where individual diversity is recognised and celebrated.
- We are committed to providing opportunities and initiatives that assist all to reach their potential.

Health & Safety

- We provide a safe environment in which our customers can enjoy themselves and our people can carry out their roles.
- We seek to ensure our facilities are operated and maintained to the highest standard.
- We operate a comprehensive health and safety programme and ensure our employees understand and practice safe work methods.

Privacy & Confidentiality

- We respect the privacy and confidential information of our employees, customers and their guests.
- We provide training to our employees on privacy and SkyCity's obligations under privacy legislation and make every effort to prevent unauthorised disclosure of confidential information.
- Our employees are bound by confidentiality obligations, as a term of their employment, to protect commercial and confidential information and not to disclose sensitive information to external parties.

Insider Trading

- Directors and employees will comply with the SkyCity Securities Trading Policy.
- No director or employee (or former director or employee) who has non-public information which could affect the price of the company's securities may buy or sell SkyCity shares or other securities.
- No director or employee with such non-public price-sensitive information may recommend or suggest other persons buy or sell or hold SkyCity shares or other securities.

Conflicts of Interest

- Directors and employees will avoid conflicts of interest in any decisions or actions and 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.

- All actual, potential or perceived conflicts of interest will be declared as outlined in the SkyCity Conflicts of Interest Policy. This includes any transaction activity that may have the potential to bring significant disrepute or reputational harm to SkyCity.

Bribes & Favours

- We will not seek to gain an advantage through the improper use of business favours or inducements.
- We do not offer, give, solicit or accept any form of bribe, including substantial or excessive gifts, entertainment or favours.
- Except for complimentaries, entertainment and hospitality activities which are normal in a business context, directors and employees will 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, accept any commission or personal profit or rebate for any business arrangement involving SkyCity, or accept gifts, entertainment or other favours where acceptance could be seen to influence a business decision.
- SkyCity also has a strict policy to limit political donations and gifts for political parties and individuals.

Competition

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

Suppliers

- We are committed to the ten principles established under the United Nations Global Compact Principles to promote ethical and sustainable procurement practices and are committed to commercially sound and sustainable business relationships with our suppliers and contractors as outlined in the SkyCity Ethical Sourcing Code.

Promotion & Advertising

- Our advertising and promotions will comply with applicable advertising standards and legislation and all statements we make about our goods and services will be accurate and complete and not misleading or deceptive.
- We will promote a range of entertainment experiences, including gambling activities, in a responsible manner.

Sustainability & the Community

- As a responsible business, we want to ensure that our communities are better off for SkyCity being involved - this includes being a responsible host, contributing to the local economy and community, empowering our people, being a leading advocate for sustainability, and ensuring responsible and ethical sourcing.

Responsible Gambling & Service of Alcohol

- We do not endorse or encourage gambling by people who show signs of having a gambling problem.
- We promote access to assistance and treatment from community service providers to our customers and actively support the prevention and treatment of problem gambling in association with them.
- We proactively assist people who request help to obtain counselling and treatment for problem gambling and encourage them to self-exclude.
- We train our employees on the identification of, and provision of assistance for, customers with gambling problems and the responsible service of alcohol.
- We promote the responsible consumption of alcohol.
- We discourage the excessive consumption of alcohol and encourage our customers not to drink and drive.

4. Written Policies

- 4.1 SkyCity may from time to time issue written policies and practices that support this Code and provide directors and employees with guidance on the conduct required to comply with this Code.

5. Compliance and Monitoring

- 5.1 Compliance with this Code is monitored through education and reporting by individuals who are aware of any suspected breach. Relevant senior executives are asked annually to provide confirmation that, to the best of their knowledge, all business matters have been conducted in accordance with this Code.
- 5.2 SkyCity also has procedures in place to investigate actual or potential theft or fraud. All significant instances are reported to the Group GM Risk and entered in the Group Risk Register and, where appropriate, are reported to the Audit and Risk Committee.
- 5.3 Any director or employee who becomes aware of any breach or suspected breach of this Code, or the policies that support this Code, has a responsibility to report to:
- the Chair of the Board (in the case of directors (other than the Chair));
 - the Deputy Chair (if there is one) or Chair of the Audit and Risk Committee (if there is not) in the case of a breach by the Chair of the Board; or
 - their manager or Human Resources Manager (in the case of employees).

Actual or suspected breaches of the Code may also be reported confidentially to SkyCity's anonymous reporting line – safe2tell (email safe2tell@skycity.co.nz, toll free 0800 759 7233 (New Zealand), toll free 1300 673 524 (Australia) or + 64 21 735 243 to send a text message).

- 5.4 Any person found to be in breach of this Code, or the policies that support this Code, will face disciplinary action in accordance with SkyCity's disciplinary procedures.