

CODE OF CONDUCT



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CITY
ENTERTAINMENT GROUP

October 2025

A message from our **SkyCity Entertainment Group, Board Chair and CEO**

SkyCity is one of New Zealand and Australia's largest tourism, leisure, and entertainment groups with over 9.2 million people visiting us every year. We are fortunate to have licenses that permit us to operate our casinos. We play an important role as a large employer of over 4,500 people and through our community trust activities.

Our customers and communities have high expectations for how we run our business, including our actions and behaviours and the decisions we make – our conduct. Many of these actions and decisions relate to keeping customers safe while gaming and at our venues and in preventing and detecting money laundering. The way we conduct ourselves is critical to maintaining trust and the ability to protect and enhance the reputation of SkyCity.

Alongside our Values, our Code of Conduct (**our Code**) reflects the way we do things at SkyCity and guides us in how we work with each other and how we make decisions. At times, it can be challenging to determine what the right decision is in each situation. Our Code includes the “should we?” test which is designed to help us exercise good judgement in these circumstances.

We are dedicated to embedding proactive risk management and a strong risk culture within our business and building on the recent improvements we've made. We also know that sometimes, even with the best efforts, things can go wrong. A critical aspect of both our Code and our Values is the commitment we're making to being open and honest about our mistakes so that we can continually evolve and improve how we operate. We know that better never stops.

We recognise that it is not always easy to raise difficult issues. That's why we are committed to a culture that encourages and supports people to speak up and report their concerns when something doesn't feel right. Our business has people at its heart, and we want everyone at SkyCity to know it is safe to speak up and that all concerns will be listened to and acted on.

By understanding and following our Code and living our Values, each of us is helping SkyCity create exceptional customer experiences, with respect and care for our communities, and maintaining the trust and confidence they have in us.

Thank you for living our Code, demonstrating our Values everyday and playing your part in continually strengthening our business.



A handwritten signature in black ink, appearing to read 'Julian Cook'.

Julian Cook
Board Chair



A handwritten signature in black ink, appearing to read 'Jason Walbridge'.

Jason Walbridge
Chief Executive Officer



About Our Code of Conduct

Everyone at SkyCity plays a crucial role in creating positive and vibrant gaming and entertainment experiences. Our Code sets the standards and expectations for how SkyCity and its employees act and make decisions. It provides us with a set of guiding principles and practices to help us do the right thing, in the right way, particularly when the path is unclear, or we are faced with difficult decisions. This applies equally to strategic leadership decisions as it does to day-day operational decisions. In relation to all decisions, big and small, it is important we do the right thing.

How we behave and make decisions ensures we meet the expectations we have of each other and preserves the trust of our customers, stakeholders, and the wider community. Our Code guides our interactions with everyone we encounter – our colleagues, customers, suppliers, shareholders, regulators and wider community, and the way we conduct ourselves is crucial to our ability to protect and enhance our reputation.



How to use the Code

Our Code applies to everyone at SkyCity and all Group entities – including Board members, our Senior Leadership Team, all full-time, part-time, casual and contract positions, and independent contractors entering into a short-term contract with SkyCity to perform a particular activity on SkyCity's behalf.

What it means for you

- Use our Code to guide your daily actions and decisions, encourage you to perform at your best, and inspire you to live our values while acting responsibly
- When making decisions, always apply our “should we?” test
- Live our Purpose, Values, and Behaviours
- Speak up if something doesn't feel right
- Share it when things go wrong, allowing us to put things right
- Read and understand the Code, if anything is unclear discuss it with your people leader



Living the Code

By joining SkyCity, employees commit to upholding our Code, contributing to a positive workplace culture and the success of our gaming and entertainment business. Adherence with our Code is mandatory as it is how we ensure that we protect the interests of our customers, communities, and each other.

We take our Code very seriously. As our Code is a representation of what we stand for and how we live our values, failure to comply with it may have consequences and result in a

variety of actions depending on the nature and seriousness of the breach. It is ingrained in how we assess and recognise performance at SkyCity.

It's your responsibility to know, understand and consistently observe the standards of conduct outlined in our Code. If you're unsure about our Code or a particular policy or procedure that applies to you, speak to your people leader or your People and Culture Partner, or Group Risk.

Our Purpose, Values and Behaviours

Together Our Purpose, Values, and Behaviours – underpinned by our Code's principles and practices describes what it means to work and succeed at SkyCity. They define why we're here and how we will act for each other, our customers, and communities.

Our Purpose

We are trusted to create vibrant places for gaming, entertainment and hospitality.

Our Values and Behaviours



We are trusted to create vibrant places for gaming, entertainment and hospitality

- We really listen and make sure everyone feels safe and supported.
- We value every individual, celebrate what makes us unique and use it to raise everyone's game.



We bring the energy - balancing fun and responsibility.

- We share our positivity and ignite excitement, building lasting memories for every customer.
- We spark genuine connections and show care, creating safe yet unforgettable experiences.



We are one - we talk, we team up and celebrate the wins.

- We collaborate by inviting different voices to the table and we keep the communication flowing.
- We consistently show up as each other's cheerleaders - recognising when we bring our best.



We play by the rules - always improving, always one step ahead.

- We learn and grow through open, honest conversations and welcoming new ideas.
- We plan ahead and do what's right for our communities, customers and SkyCity, even when no one is watching.

The “should we?” test

Ensuring that we do what is right can sometimes be complex and asking “can we?” is often not quite enough, we also need to ask, “should we?”. Our customers and the community expect us to exercise good judgement and asking “should we?” is a simple way to ensure we make the right decisions to do the right thing consistently.

Being able to answer “yes” to the following questions will likely mean that you are working within our Code:

- Is it consistent with our values and policies?
- Am I being transparent?
- Is it fair to the customer and our community now and going forward?
- Would I be comfortable to tell a friend or family member about it (assuming the information is not restricted or confidential)?
- Would I be comfortable if my actions were made public (for example on social media)?

If you have answered “no” or are not sure about any of these questions, then you should talk to your people leader for further advice and guidance.

Speaking up

Having safe and confidential ways for employees to report concerns is a key part of a healthy culture. SkyCity is committed to creating a culture of where employees feel safe and are encouraged to speak up on matters or conduct that concerns them. This could be anything from serious misconduct to behaviours that are not in line with our values or our Code.

Each of us has a responsibility to report actual or suspected breaches of our Code. It is important that you speak up, if you see or suspect a violation of the law, our Code, any SkyCity policies, or have any concerns in relation to any “should we?” related matters. You should always feel comfortable asking a question or reporting a concern using whichever channel you prefer.

You can raise concerns with your people leader, SLT member, anyone in the Risk team, the Group GM Internal Audit, a Board Director or via safe2tell, SkyCity’s independently run whistleblower hotline. More information on how to raise concerns and what to expect can be found in the Whistleblower Policy.



Our Principles and Practices

These principles and practices outline the standards and expectations of our company and our employees to do what is right, to comply with laws and policies, live our Values and behave professionally.



Caring for our people, customers and communities

People are at the heart of everything we do. We care about each other, our communities, and we serve our customers with openness and respect. We are committed to providing impactful programs and innovative technologies to increase safer play and minimise gambling and alcohol related harms.

What does this mean for us?

We care about each other and protect the health, safety and wellbeing of our people and customers who visit our precinct.

We care about delivering a safe and responsible environment for our customers, through meeting our legal and social obligations and identifying and implementing industry leading practices in the management of gambling related harm and the responsible service of alcohol.

We understand the needs of our customers and work collectively to deliver safe and outstanding entertainment experiences.

We listen to customer feedback, continuously improve our experiences, and maintain open

communication to build lasting relationships built on respect.

We encourage work-life balance and provide resources for physical and mental well-being recognising that a healthy and happy team is essential for success. If you encounter challenges, communicate with your people leader, the Connect team or People and Culture to explore support options.

We actively contribute to the communities in which we operate through responsible practices, volunteering, and support for local initiatives including via our Community Trusts, and responsible practices.

We actively work towards sustainable practices, minimising our environmental footprint and promoting eco-friendly initiatives.

Key policies and more information

- Health, Safety and Wellbeing Policy
- Responsible Service of Alcohol Policy
- Host Responsibility Programme

Act with Integrity and Courage

Acting with integrity and courage is at the heart of our values, as a truly responsible business we strive to run our business in a manner that adheres to the spirit of our obligations, upholds integrity and fairness, and that proactively considers risk in our activities.

What does this mean for us?

When we make decisions, we ask “should we?” not just “can we?” and consider our values, and the risks to our business and communities. This applies to all decisions, from the highest impact strategic or leadership decisions that can have a significant impact on the entire company or a whole business area to seemingly smaller decisions we all make from time to time.

We take accountability for our actions and hold each other accountable. This applies to everyone from our senior management to our most junior staff.

We ensure our actions personally and professionally do not cause harm to customers and communities or put SkyCity’s reputation at risk.

We conduct all aspects of our roles with honesty and integrity.

We take care to identify and manage any actual or perceived conflicts of interest.

Putting the interests of customers and SkyCity ahead of our own.

We meet our obligations and follow spirit of the laws, regulations and SkyCity policies (including our Code) that govern us.

We establish strong and ethical business relationships with others and never make or receive, or enable others to make or receive, improper payments, benefits, or gains.

We encourage a culture of continuous learning and when things go wrong, they are escalated with transparency and in a timely way so they can be put right.

We take unlawful and unethical behaviour seriously – if we think something is not right, we speak up as soon as possible, and we listen and respond.

We safeguard privacy and confidential or sensitive company data. We protect information from unauthorised access or use and do not disclose sensitive information without proper authorisation. This means we only access and share customer, business and employee data on a ‘need to know’ basis, not just because we can.

We take care when we speak on behalf of SkyCity or release information externally and don’t speak on behalf of SkyCity unless we are authorised to make public comments.

We take care when posting or commenting on social media, even when these arise in our personal capacity.

We ensure that our people have the right knowledge and skills to perform their roles including, completing training and holding any required accreditations.

Key policies and more information

- Privacy Policy
- Fraud Management Policy
- Conflict Management Policy
- Securities Trading Policy
- Gift, Tips and Hospitality Policy
- Acceptable Use of Technology Policy
- Social Media Policy
- Anti-Bribery and Corruption Policy
- Whistleblowing Policy
- Enterprise Risk Management Framework





Working Together as One

Core to our values is passion for creating exceptional experiences for our customers. We are unwavering in our commitment to do what's right, we work together to get things done and light up every moment.

What does this mean for us?

We understand that we are stronger together and so we collaborate effectively with each other and our communities in pursuit of our Purpose. This means thinking wider than just our team when it comes to how we operate.

Our People Leaders at all levels, role model expected behaviours and work proactively to create psychological safety. We treat all colleagues and customers with respect and dignity, regardless of their background, identity or role in the business.

We value every individual, welcome and embrace diversity and create an inclusive workplace where all voices are heard and valued. We do not tolerate discrimination, bullying or harassment or behaviour that is not compatible with SkyCity values.

We communicate and work effectively across teams to raise everyone's games and unlock greater potential.

We create and maintain an environment where ideas are valued, and constructive feedback is provided to promote individual and collective growth.

We work constructively with regulators, law enforcement agencies and other bodies and ensure we are open and transparent as we do so.

Acknowledgement

SkyCity Adelaide acknowledges Traditional Owners of the land on which we operate, the Kaurna people, and recognises the continuing connection to lands, waters and communities. We pay our respect to Aboriginal and Torres Strait Islander cultures; and to Elders past and present.

Key policies and more information

- [Workplace Behaviour Policy](#)
- [Diversity, Equity & Inclusion Policy](#)
- [Social Media Policy](#)

