

SkyCity Entertainment Group Limited

Health and Safety Policy

Policy Owner	Group General Manager - NZICC Dev & Tourism
Policy Approver	Board
Approval Date	May 2025
Review Cycle	Every two years
Next Review Date	May 2027

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Purpose and scope

At SkyCity, we care about the health, safety and wellbeing (**HSW**) of our people, our partners, our customers and our communities. The Code of Conduct and our Values support SkyCity's commitment to HSW. Our goal is to prevent injuries and illnesses by adhering to applicable health and safety legislation, standards, and practices and continuously improving our workplace conditions.

The purpose of this Health and Safety Policy (**Policy**) is to create a safe, healthy, and supportive environment for our employees, customers, and stakeholders. At SkyCity, we believe a strong health and safety culture is essential to keep our employees and customers safe while preventing key losses that could affect the business.

This Policy aims to:

- Explain how SkyCity provides a workplace that aims to eliminate or reduce risk to Health and Safety (**H&S**) by implementing practices that protect both psychological and physical safety.
- Embed a safety culture providing clear expectations and accountabilities for HSW.

This Policy applies to all H&S matters excluding food safety. This Policy applies to all entities within the group of bodies corporate ultimately owned or controlled by SkyCity Entertainment Group Limited (**'SkyCity'** or **'the Group'**) and all SkyCity employees, contractors, and sub-contractors of the Group.

Policy statement

We are committed to ensuring the duty of care of our people, suppliers, contractors, and customers by adhering to all applicable H&S legislation, standards, and best practices. This commitment ensures that we not only meet but exceed industry standards, continuously improving and adapting to new challenges and opportunities to maintain compliance. This commitment is detailed in SkyCity's Health Safety and Wellbeing Statement of Commitment available on SkyCity's website and in **Appendix 1**.

In line with our Code of Conduct, every employee is responsible for upholding H&S standards by contributing to a safe environment, exercising good judgment, and reporting potential hazards.

Key definitions

Phrase/Acronym	Definition
Corrective Action	An action identified to correct a non-conformity of the HSMS (see below), and/or an incident to prevent re-occurrence
Critical Risk	Critical risks are those that have been rated to have an extreme impact if not adequately controlled. This impact could include grave damage to the business operation or result in catastrophic harm such as worker fatalities, permanent

Phrase/Acronym	Definition
	impairment, and chronic health and psychological harm to a person/s
Donesafe	SkyCity Entertainment Group Limited's (SCEG) digital platform used to manage health, safety, and compliance processes within the organisation
Hazard	A source of potential harm, or a situation with potential for harm to human health and wellbeing
HSMS	Health and Safety Management System
H&S Ambassador	A SCEG employee who has been elected by their work group under the relevant legislation (i.e. Health and Safety at Work Act 2015 (HSWA) (New Zealand), or Work Health and Safety Act 2012 (SA)) to represent them on H&S matters, or who volunteers for the role
H&S Incident	A work-related event in which an adverse health and safety event has occurred or could have occurred (near miss)
H&S Risk	The likelihood of a hazard causing harm, combined with the severity of that harm. It involves assessing the probability of harm occurring and the potential consequences

Policy principles

Our Policy ensures a safe and healthy environment for our employees, contractors, and customers by proactively managing risks and promoting wellbeing, with a focus on the following key areas:

- to clearly define individual responsibilities for health and safety, and hold ourselves and each other accountable for our actions
- to grow a culture of ownership driven through strong leadership and holding each other accountable for improving health, safety and wellbeing
- to provide understanding and build capability to allow a collective approach for controlling our health, safety and wellbeing risks
- to allocate the required resources, internal and external expertise, training, and tools to support our health, safety and wellbeing strategy and programme
- in partnership with our people, to create and provide organisational policies and procedures, accessible via Donesafe

- to promote all our people to engage in consulting and resolving health, safety and wellbeing matters and learning opportunities
- to establish a strategy and systems that define clear and concise objectives that measure and continually improve our health, safety and wellbeing performance
- to make our people and partners responsible and empower them to protect and promote health, safety and wellbeing across the Group
- to regularly monitor our health, safety and wellbeing processes and systems to gain assurance and action opportunities for improvements
- to identify and collectively manage hazards with our people and partners, ensuring risks are prioritised during resolution.

Health and safety management system

The Policy principles are underpinned by the Enterprise Risk Management Framework and Health and Safety Management System (**HSMS**), the system through which SkyCity translates its Policy and objectives into standards of practice and behaviours that are required of our people.

The HSMS ensures a comprehensive and systematic approach to managing workplace HSW through the following elements:

- **Planning:** To establish and implement a HSW strategy through the development of annual HSW Roadmaps, deliverables, objectives, and goals so SkyCity can continuously improve its HSMS and HSW performance.
- **Governance:** To provide processes that enable SkyCity Senior Management to exercise governance and due diligence over HSW hazards and risks associated with the business activities undertaken by SkyCity. This includes reviewing and providing input to SkyCity's HSW strategy and HSMS, as well as monitoring their effectiveness in managing risks and promoting a healthy and safe working environment for SkyCity's people, customers, and partners.
- **Legal Obligations:** To provide processes for identifying and reviewing changes in legal and other requirements related to SkyCity's business undertakings, hazards, risks, and HSMS, ensuring ongoing compliance and meeting HSW obligations.
- **Health and Safety Risk Management:** To ensure that we have processes in place to identify hazards, review and apply controls, and monitor risks by applying the principles of risk management. This approach ensures the prevention of harm, illness, and loss to employees, contractors, visitors, members of the public, and in both routine and non-routine activities, as well as foreseeable emergencies. To establish risk assessment processes for identifying and evaluating SkyCity's critical hazards, risks, and controls, to determine factors that could lead to a critical risk incident resulting in serious harm or significant loss.
- **Emergency Preparedness:** To ensure the establishment and implementation of an emergency preparedness framework that defines the requirements and activities related to emergency preparedness, response, and recovery. Site Emergency Plans

and procedures for specific emergency events are identified and managed through pre-planning, consultation and risk assessment.

- **Health and Safety Incident management:** To provide processes for investigating and reviewing reported health and safety incidents to identify contributing factors, root causes, and implement actions for improvement, while sharing learnings across SkyCity sites. Ensures that recommendations made are applied within an agreed timeframe, and improved risk controls are monitored and reviewed for ongoing effectiveness. Introduces processes that enable SkyCity to inform the HS regulator of all events determined to be ‘notifiable’ as per legal reporting requirements.
- **Training and Competence:** To provide processes for identifying SkyCity employees’ HSW training and competency needs, enabling them to update existing health and safety knowledge, acquire new skills, behaviours, and abilities, and perform work safely—including critical risk tasks—successfully in a defined work setting.
- **Consultation, Communication and Participation:** To ensure that SkyCity has a framework in place for employee HSW consultation, communication, and participation across our sites. This framework includes the involvement of SkyCity’s business departments’ H&S Governance and Engagement Groups, facilitated by leaders, employees, and trained H&S Ambassadors.
- **Contactor and Supplier Management:** To provide standards and procedures to ensure that contractors and suppliers are only selected to work for SkyCity if they are appropriately insured, qualified and/or licensed according to the categories and level of risk. Identifies and controls risks in relation to the activities that they intend to carry out on our sites, to ensure the intended outcome of SkyCity’s HSMS.
- **Measuring and Monitoring:** To conduct management reviews of SkyCity’s HSMS to ensure its ongoing suitability, adequacy, and effectiveness. To ensure that SkyCity participates in internal and external assurance activities to evaluate its compliance, best practices, and continuous improvement in relation to legal obligations and other requirements. Critical hazards and risks, risk levels, types of control measures, trends in incidents, injuries, illnesses, corrective actions, and reported hazards will be key components of measurement and monitoring activities.
- **Injury Management:** To enhance a proactive injury management standard and procedures that ensure quick access to high-quality treatment and services through a dedicated injury management team to promote and maintain employee’s wellness, early intervention, and injury prevention. In the event of an injury, the goal is to support recovery at work or an appropriate and timely return to work.

Key accountabilities

The following key accountabilities apply:

Who	Key accountabilities
Board	<ul style="list-style-type: none"> • Approve the Policy

Who	Key accountabilities
	<ul style="list-style-type: none"> • Exercise due diligence as an Officer of SkyCity • Oversee the Policy and its effectiveness • Accountable for ensuring Management delivers required HSW outcomes • Set the direction, and commitment for HSW management and performance • Set a visible example through engagement with managers and workers. This provides leadership and improves knowledge of Health and Safety matters • Lead the direction of and approve HSW strategies, objectives and governance management • Provide sufficient funds to ensure there are enough resources to facilitate effective HSW management and eliminate and minimise identified risks
SLT Risk and Assurance Committee (SLT Risk Co)	<ul style="list-style-type: none"> • Provide guidance and input into policy development and amendments
Senior Leadership Team (SLT)	<ul style="list-style-type: none"> • Demonstrate a commitment to health and safety by consistently following and upholding safety policies and procedures • Allocate adequate resources, tools, and equipment to maintain a safe working environment • Lead a culture and working environment that fosters proactively addresses risks and promotes wellbeing • Take ownership of the physical and psychological health and safety risks and the strategy within their business • Develop and implement processes that support the requirements of the health and safety risk management framework to be effective, including designing, implementing, and operating controls to manage their own health and safety risks • Assign responsibilities for managing material risks and key controls • Monitor, review and govern the business' health and safety profile including control effectiveness to identify, understand,

Who	Key accountabilities
	<p>escalate and report on health and safety issues, incidents, and changes in the business' health and safety profile. This includes changes that may have a material impact to the existing business environment</p>
Group GM Health and Safety	<ul style="list-style-type: none"> • Report to Senior Management, the Board or Board Committee regarding the management of HSW compliance across the Group • Continual improvement in the HSMS involving the participation of employees and relevant interested parties • Develop, implement and maintain processes of the HSMS, provide ongoing monitoring of the currency and effectiveness of the HSMS • Ensure that the HSMS complies with legal and other requirements • Provide direction and support to contribute to the effectiveness of the HSMS and develop • Lead and promote a culture in SkyCity that supports the intended outcome of the HSMS • Develop, implement, communicate, and monitor SkyCity's health, safety, and wellbeing strategy, policies, and objectives in consultation with employees to ensure effectiveness and alignment with strategic goals
Health, Safety and Wellbeing team	<ul style="list-style-type: none"> • Own and implement the Health and Safety Management System by providing people, processes, and system capability to support its implementation. This includes policies, processes, guides, and tools • Provide advice, guidance, and oversight of HSW compliance • Identify issues and trends across the Group and escalate as necessary
All General Managers	<ul style="list-style-type: none"> • Apply and adhere to the HSMS and wellbeing systems and programs for maintaining a physically and psychologically healthy and safe workplace • Ensure the health and safety of our people and customers including providing them with appropriate information, training and supervision
People Leaders	<ul style="list-style-type: none"> • Demonstrate a commitment to health and safety by

Who	Key accountabilities
	<p>consistently following and upholding safety policies and procedures</p> <ul style="list-style-type: none"> • Encourage open communication about health and safety concerns and foster a culture where safety is a priority • Promote the principles of this Policy
All employees	<ul style="list-style-type: none"> • Perform their role in a manner consistent with the Policy and Our Code of Conduct • Timely reporting of any unsafe conditions, hazards, or incidents into Donesafe or to their People Leader • Take reasonable care for their own health, safety and wellbeing • Take reasonable care that their actions and conduct does not adversely affect the health and safety of others • Comply and co-operate, so far as is reasonably able, with any reasonable instruction that is given by the Group, including any Group Policy or Procedure for maintaining a safe and healthy workplace
Group Risk	<ul style="list-style-type: none"> • Advise and provide guidance to the business to effectively identify, measure and mitigate their risks and/or to identify and understand their obligations (as applicable) • Identify, track, and forecast impending regulatory changes and work with business unites to determine the impact and implement the change
Legal	<ul style="list-style-type: none"> • Verify that the Policy aligns with relevant laws and regulations
Group Assurance	<ul style="list-style-type: none"> • Providing independent assurance that the Group's risk management, governance and internal control processes are operating effectively, as per the approved audit plan

Compliance statement

This policy is an integral part of SkyCity's Health and Safety Management System and has been developed to meet SkyCity's health and safety obligations, including those outlined in relevant documents.

Breach of policy

Any breach of this Policy, HSMS manual or procedures is a serious matter that may also amount to a breach of SkyCity's Code of Conduct and values and may result in disciplinary action, including termination of employment. Additionally, employees may be subject to legal penalties under relevant legislation, which could result in fines or prosecution.

Where an Officer, People Leader or employee wilfully or recklessly endangers the HSW of another person at work, criminal charges may also apply. SkyCity will take all necessary actions to investigate breaches and ensure compliance with the obligations outlined in the relevant documents.

Relevant documents

Internal documentation

- Our Code of Conduct
- Enterprise Risk Management Framework
- Risk Assessment Standard
- Health and Safety Incident Management Standard
- Health and Safety Management System Manual
- Health and Safety Hazard and Risk Management Standard
- Confined Spaces Standard
- Working at Heights Standard
- Hazardous Materials Standard
- Electrical Works Standard

External sources of obligations

- Work Health and Safety Act 2012 (SA) and associated regulations
- Health and Safety at Work Act 2015 (NZ) and associated regulations
- ACC Accredited Employers Programme (NZ)
- Return to Work Act 2014 (SA)

Revisions

Version	Approval date	Effective date	Implementation date	Details
1.0	April 2025	April 2025	April 2025	New Policy
2.0	May 2025	May 2025	May 2025	Amendment to internal document titles to

				clarify their relevance to Health & Safety
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Appendix 1: Our Health and Safety Commitment One-Pager



skyCITY

Our Health & Safety Commitment

At SkyCity, we care about the health, safety and well-being (HSW) of our people, our partners, our customers and our communities. We aim to provide a healthy work environment that fosters empowerment and ownership, where our Employees and Partners have opportunities to improve and grow their HSW.

To support this commitment, we will:

- Clearly define individual responsibilities for managing and improving HSW
- Provide goals and objectives that continually improve our HSW performance
- Provide a culture of ownership, commitment and accountability
- Develop HSW policies and procedures made accessible via Done safe
- Report, investigate and learn from our incidents
- Identify, and manage our health and safety hazards and risks
- Provide a duty of care with all relevant HSW legislation, standards and practices
- Engage with our employees and partners to resolve HSW matters
- Deliver on our HSW strategies and plans
- Monitor and review our HSW performance, system and procedures



Jason Wallbridge
Chief Executive Officer



Callum Mallett
Chief Operating Officer