

Modern Slavery Statement 2023

# WE'RE RAISING THE GAME



**Tabcorp**

# ACKNOWLEDGEMENT OF COUNTRY



Tabcorp recognises Aboriginal and Torres Strait Islander peoples as the First Australians and the Traditional Custodians of the lands on which we live, learn and work. We pay our respects to their Elders past, present and emerging.

Tabcorp commissioned this digital artwork by Ngarraindjeri Indigenous artist Jordan Lovegrove of Dreamtime Creative last year. The artwork represents Tabcorp combining its deep experience with embracing new horizons and ways of working together. The large central meeting place symbolises Tabcorp while the bottom left section represents its history. The smaller meeting places depict coming together to find new ways forward, while the right section is the present and future which is bright and fresh.

## INTRODUCTION

This Modern Slavery Statement (**Statement**) covers the activities of Tabcorp Holdings Limited (ABN 66 063 780 709) and the consolidated entity comprising Tabcorp Holdings Limited, and all entities owned or controlled by it (**Tabcorp or Group**) and the Group's interests in joint arrangements and associates in respect of the financial year ended 30 June 2023 (**FY23**) in identifying and addressing the potential risk of modern slavery and human trafficking in our operations and supply chain.

Tabcorp's entities take a consolidated, whole-of-group approach to human rights, modern slavery and responsible procurement. As such, this Statement addresses the actions taken by all reporting entities within the Group. Unless otherwise indicated in this Statement, the terms 'Tabcorp', 'Group', 'our business', 'we', 'us' and 'our' refer to Tabcorp Holdings Limited and its controlled entities collectively (including all reporting entities).

A list of Tabcorp's controlled entities is available in our 2023 Annual Report. A list of Tabcorp's entities that are considered reporting entities under the *Modern Slavery Act 2018 (Cth)* (**Act**) is available on page 20. Tabcorp makes this joint Statement on behalf of itself and these reporting entities as well as all other entities owned or controlled by the Group.



Tabcorp is a signatory to the United Nations Global Compact (**UNGC**) and a participant of the United Nations Global Compact Network Australia. We strongly support the Ten Principles of the UNGC in the areas of Human Rights, Labour, Environment and Anti-Corruption, and aim to contribute to the UN Sustainable Development Goals (**SDGs**) through our operations and supply chains.

## CONTENTS

CEO message	3
About Tabcorp	4
Our values	6
Sustainability framework	7
FY23 highlights	8
Governance	9
Policy framework	10
Stakeholder engagement	11
Risk identification	12
Risk management	13
Our operations	14
Our supply chain	15
Grievance mechanisms	17
Remediation	18
Capability building	18
Effectiveness	19
Future priorities	19
Reporting entities	20
Consultation and approval process	20
Statement annexure	21
Forward-looking statements	21

## CEO MESSAGE



Modern slavery is a complex issue that requires a coordinated and collaborative response across governments, businesses and civil society.

We have an important role to play in the daily lives of many people in our operations, supply chains and in the communities in which we operate. It's our joint responsibility to safeguard the rights of our team members and workers in our supply chains and we remain committed to ethical, sustainable and socially responsible business practices to fulfill this responsibility.

Despite another challenging year with natural disasters, economic pressures and international political unrest disrupting our business and supply chains, we continued to progress our Responsible Procurement Plan for Modern Slavery.

We introduced independent third party audits on key suppliers, developed and delivered scenario-based training related to modern slavery for key team members, and continued to build internal capability and understanding of modern slavery risks.

We are pleased with the progress we have made but recognise the need to keep improving. We'll keep learning, adapting, and improving, so we can continue **Raising the Game** and make a positive change in this area.

A handwritten signature in black ink, which appears to read 'Adam Rytenskild'. The signature is fluid and cursive, written over a light blue background.

**Adam Rytenskild**  
Managing Director and  
Chief Executive Officer

7 December 2023

## ABOUT TABCORP

We're the big Australian player. We operate a portfolio of leading Australian brands across wagering, media and integrity services, with national scale and reach. We also operate complementary international wagering and broadcasting businesses.

Our purpose is to create the most engaging betting and entertainment experiences in Australia, and share it with the world. We're here to deliver excitement – through our incredible people, market leading products and exceptional experiences that our customers love.



**TAB** is Australia's biggest multi-channel wagering brand, offering a broad range of betting experiences across digital channels and in retail throughout Victoria, New South Wales, Queensland, South Australia, Tasmania, Northern Territory and the ACT.



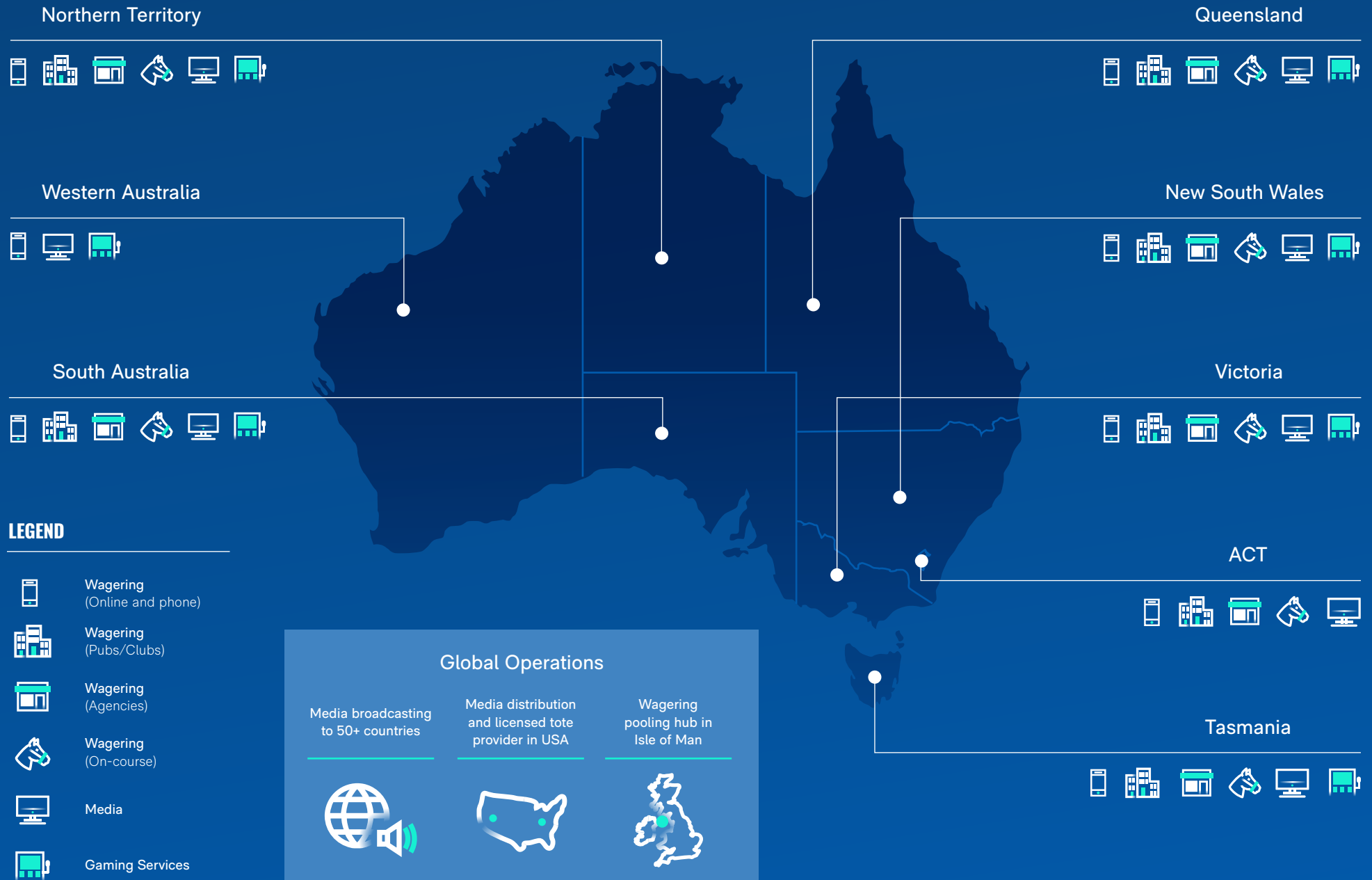
**Sky** is a leader in multi-venue, multi-channel racing and sports broadcasting throughout Australia and internationally.



**Premier Gateway International** is one of the largest global wagering and tote pooling hubs, based in the Isle of Man, and **Sky Racing World** is a US-based distributor of international racing content and facilitator of associated tote pools.



**MAX**, Australia's leading gaming services provider, offers electronic gaming machine monitoring and related integrity services, as well as other gaming-related services to venues.



# OUR VALUES

We're building a new culture at Tabcorp, underpinned by the launch of our new Values. They're uniquely 'us' – clear and actionable, with a sense of excitement and energy, and a renewed purpose to succeed.



## SPARK *Change*

**We disrupt and spark change to make it better.**

We're curious, hungry for success and we back each other with confidence. We're smart and use our initiative to make decisions and act in ways that have impact, fast. We are problem-solvers, not problem admirers. If we see an issue, we bring a solution mindset and fix it quickly. This means we put improvements in the hands of our customers as quickly as possible.



## PLAY *Fair*

**We do what's right for our customers, partners, and each other, always.**

We're accountable and own our actions and decisions. We're ethical, respectful, and inclusive, and we create a level playing field for all. We know that doing the right thing delivers value for us in the long run, so we responsibly grow our business and people in ways that make us proud. Honest and reliable, underpinned by a culture of warmth, respect and belonging, where everyone is welcome and supported to be their best.



## RAISE THE *Roof*

**We bring our passion and have fun doing what we love.**

We loudly celebrate our wins and effort, both big and small. We draw energy and optimism from the excitement of our industry. Passion fuels us and having pride in who we are and what we do turns a daily job into a daily joy. Our enthusiasm is contagious, and our 'can do' attitude fosters a positive environment for ourselves and our customers to thrive.

















# SUSTAINABILITY FRAMEWORK

As part of our vision of **Raising the Game**, we're committed to being here for the long term by taking care of our customers and people, being part of the community and operating our business with integrity.

Respecting human rights and standing against modern slavery is critical to achieving this vision and delivering long term shareholder value.





Our commitment to respecting and contributing to the realisation of the human rights of all people impacted by our operations and business relationships is reflected in our Sustainability Framework (shown opposite).

Our detailed ESG approach and performance is set out in our 2023 Sustainability Report available at [www.tabcorp.com.au/sustainability](http://www.tabcorp.com.au/sustainability)

<h2>OUR PRIORITIES</h2>	 <p><b>Customer Care</b></p>	 <p><b>Contribute to our Community</b></p>	 <p><b>Support our People to Succeed</b></p>	 <p><b>Build a Sustainable Future</b></p>
<h2>GUIDING PRINCIPLES</h2>	<ul style="list-style-type: none"> <li>We put our customers first, delivering experiences safely and responsibly</li> </ul>	<ul style="list-style-type: none"> <li>We build collaborative partnerships to shape our industry and impact our communities for the better</li> </ul>	<ul style="list-style-type: none"> <li>We provide our people with an exciting workplace to succeed</li> </ul>	<ul style="list-style-type: none"> <li>We are building a sustainable future for our business</li> </ul>
<h2>OUR GOALS</h2>	<ul style="list-style-type: none"> <li>Deliver customer-centric responsible wagering and gaming initiatives designed to prevent and minimise harm</li> <li>Build and maintain cyber security controls that protect our customers' privacy and security and drive competitive advantage through customer and stakeholder trust</li> </ul>	<ul style="list-style-type: none"> <li>Contribute to the strength of our stakeholders through shared economic benefits and industry support</li> <li>Deliver strategic community partnerships and investment to support the communities we operate in</li> <li>Engage on key industry issues such as animal welfare and sports integrity</li> </ul>	<ul style="list-style-type: none"> <li>Foster a diverse, equitable and inclusive workplace</li> <li>Invest in the health, safety and wellbeing of our team</li> <li>Attract the best talent and support our team to shape their careers</li> </ul>	<ul style="list-style-type: none"> <li>Deliver a robust, transparent and effective approach to ESG</li> <li>Develop a Net Zero roadmap to support our emission reduction targets</li> <li>Source products and services responsibly and sustainably</li> </ul>
<h2>ALIGNMENT WITH UN SUSTAINABLE DEVELOPMENT GOALS</h2>			  	    

# FY23 HIGHLIGHTS

Our key achievements since the beginning of the reporting period include:

 <b>EXTERNAL ALIGNMENT</b>	<ul style="list-style-type: none"><li>• Joined the National Retail Association (<b>NRA</b>) ESG Committee, a forum facilitated by the NRA, where Australian business participants can connect, navigate new developments, share learnings regarding ESG and consider ways to go beyond regulatory requirements. ESG topics include human rights and modern slavery.</li></ul>
 <b>OPERATIONS</b>	<ul style="list-style-type: none"><li>• Progressed our Responsible Procurement Plan to address modern slavery in our operations and supply chains. Tabcorp suppliers have been segmented and categorised against a best practice Supplier Relationship Management framework using seven key scoring criteria, which includes potential modern slavery/human rights risks.</li><li>• Continued to uplift supplier due diligence capabilities by initiating the implementation of new technology to enhance the supplier risk assessment processes. This technology forms part of our Source to Contract roadmap and includes upfront modern slavery qualification questions.</li></ul>
 <b>AUDITS</b>	<ul style="list-style-type: none"><li>• Introduced independent third party audits on three key suppliers. These suppliers were selected based on high risk industries, utilising the Global Slavery Index, and assessed against seven key risk criteria. The audits were performed by an independent third party organisation, who had expertise in assessing supply chain practices and compliance with social standards, laws and regulations. The audits involved a comprehensive review of the suppliers' operations, labour practices and management systems to assess their commitment and controls into working to eradicate modern slavery from their business processes.</li></ul>
 <b>TRAINING AND AWARENESS</b>	<ul style="list-style-type: none"><li>• Developed and delivered scenario-based training relating to modern slavery for key team members involved in the procurement of goods and services.</li><li>• Case study training conducted in partnership with Procurement Leaders.</li><li>• Revised policies to include a reference to our Human Rights Policy, where applicable.</li><li>• Continued to build capability and understanding of modern slavery risks at the executive and board levels.</li></ul>



# GOVERNANCE

Our corporate governance arrangements to address human rights and modern slavery are core to our mission to set the benchmark for sustainability in our industry.

Our Executive and Board Risk, Compliance and Sustainability Committees are responsible for overseeing our Sustainability Framework, which includes our response to modern slavery risks.

Outcomes are reported regularly through these Committees, and annually in this Statement. A summary of our governance framework is outlined in the following table.

<b>BOARD</b>	Responsible for overseeing our response to modern slavery risks and reviewing and approving our Modern Slavery Statement. Delegates authority to the Board Risk, Compliance and Sustainability Committee to review and monitor material business risks, subject to the Board's ultimate accountability and oversight	
<b>BOARD RISK, COMPLIANCE AND SUSTAINABILITY COMMITTEE</b>	Responsible for overseeing delivery of the Sustainability Framework, including management of human rights and modern slavery issues, together with our risk and compliance framework. Engages with other Board Committees, such as the People and Remuneration Committee	
<b>MANAGEMENT OVERSIGHT</b>	<b>CEO and Executive Leadership Team</b> Accountable for managing modern slavery risks and the overall implementation of our Sustainability Framework	<b>Supported by the Executive Risk, Compliance and Sustainability Committee</b>
<b>COORDINATION AND REPORTING</b>	<b>Governance and Sustainability Team</b> Responsible for developing and reviewing the Sustainability Framework, supporting the preparation of the Responsible Procurement Plan for Modern Slavery, tracking progress, and coordinating the preparation of our Modern Slavery Statement	<b>Supported by the Modern Slavery SteerCo and independent professional advisers, as required</b>
<b>EXECUTION</b>	<b>Business and functional units</b> Responsible for executing the Responsible Procurement Plan for Modern Slavery, identifying and managing modern slavery risks, and reporting progress	<b>Supported by policies and procedures, as approved by the Executive Leadership Team and the Board</b>

# POLICY FRAMEWORK

We have a number of policies and codes in place to address modern slavery in our operations and supply chain. These documents support our governance framework and are periodically reviewed and updated, with oversight from our Executive Leadership Team, Board of Directors and its committees, as detailed in the table below.

Policy/Code	Description
<b>Tabcorp Code of Conduct</b>	Defines our expected standards of behaviour across eleven guiding principles, including acting ethically and with integrity, treating people with dignity and respect and calling out dishonest and unethical behaviour. It includes practical guidance for team members about how to access support and report if they experience or witness behaviour not aligned with the Code
<b>Supplier Code of Conduct</b>	Outlines the expectations we have of our suppliers across six areas: <ul style="list-style-type: none"> <li>• Integrity, ethics and corporate conduct</li> <li>• Corporate governance</li> <li>• Labour and human rights</li> <li>• Privacy and cyber security</li> <li>• Health, safety and wellbeing</li> <li>• Environmental management</li> </ul>
<b>Human Rights Policy</b>	Formalises our commitment to respecting the human rights of the people we interact with and who are impacted by our business operations and relationships
<b>Whistleblower Policy</b>	Describes the process for making and investigating a disclosure, in line with applicable whistleblower protection legislation. It applies to current and former team members, Directors, contractors and suppliers, including employees of contractors and suppliers
<b>Inclusion and Diversity Policy</b>	Sets out our commitment to a culture of inclusion and the creation of a bias free workplace where all are welcomed and respected
<b>Workplace Health, Safety and Wellbeing Policy</b>	Outlines our commitment to eliminating or reducing health and safety risks, demonstrating leadership in, and commitment to, all areas of health, safety and wellbeing and fostering a culture of wellbeing by providing resources that reinforce healthy lifestyle choices
<b>Talent Acquisition Policy</b>	Defines our approach to the selection and recruitment of team members, in order to maintain a framework that's lawful, rigorous, transparent, and aligns with our inclusion and diversity objectives
<b>Procurement Policy</b>	Sets out our approach to procuring goods and services, including individuals' accountability for their procurement decisions. It also outlines team members' obligations before selecting new suppliers, such as performing appropriate due diligence, in line with our procurement guidelines
<b>Anti-Money Laundering and Counter-Terrorism Financing Policy (AML/CTF)</b>	Outlines our commitment to disrupting and combating money laundering activities, terrorism financing and other serious financial crimes (such as tax evasion, drug dealing, human trafficking, cheating at gambling). It also articulates AML/CTF compliance obligations required from all team members
<b>Anti-Bribery and Corruption Policy</b>	Sets out our commitment to the highest levels of ethical behaviour, including zero tolerance for bribery, corruption and fraudulent or dishonest conduct by team members in any form
<b>Sanctions Policy</b>	Outlines our sanctions management principles and team members' obligations and expected conduct to manage and comply with sanctions laws. Sanctions may be used in cases where, for example, a country or regime is violating human rights, waging war or endangering international peace and security

A number of these policies are available from the Tabcorp website at [www.tabcorp.com.au/company/corporate-governance](http://www.tabcorp.com.au/company/corporate-governance). These policies are in addition to our risk and compliance management policies. Refer to the Risk Management section of this Statement.

# STAKEHOLDER ENGAGEMENT

Our operations and supply chains involve a diverse range of stakeholders, who expect us to meet our commitments and take action on modern slavery.

Tabcorp is a member of Procurement Leaders and the Fintel Alliance, an AUSTRAC initiative established to increase the resilience of the financial sector to criminal exploitation and support law enforcement investigations into serious crime and national security matters. The Fintel Alliance is a public-private partnership which brings together experts from a range of organisations involved in the fight against money laundering, terrorism financing and other serious crime.

The Group is also a participant of the United Nations Global Compact Network Australia (**UNGCNA**) Modern Slavery Community of Practice. This small and interactive forum helps Australian businesses navigate new developments and share learnings regarding modern slavery.

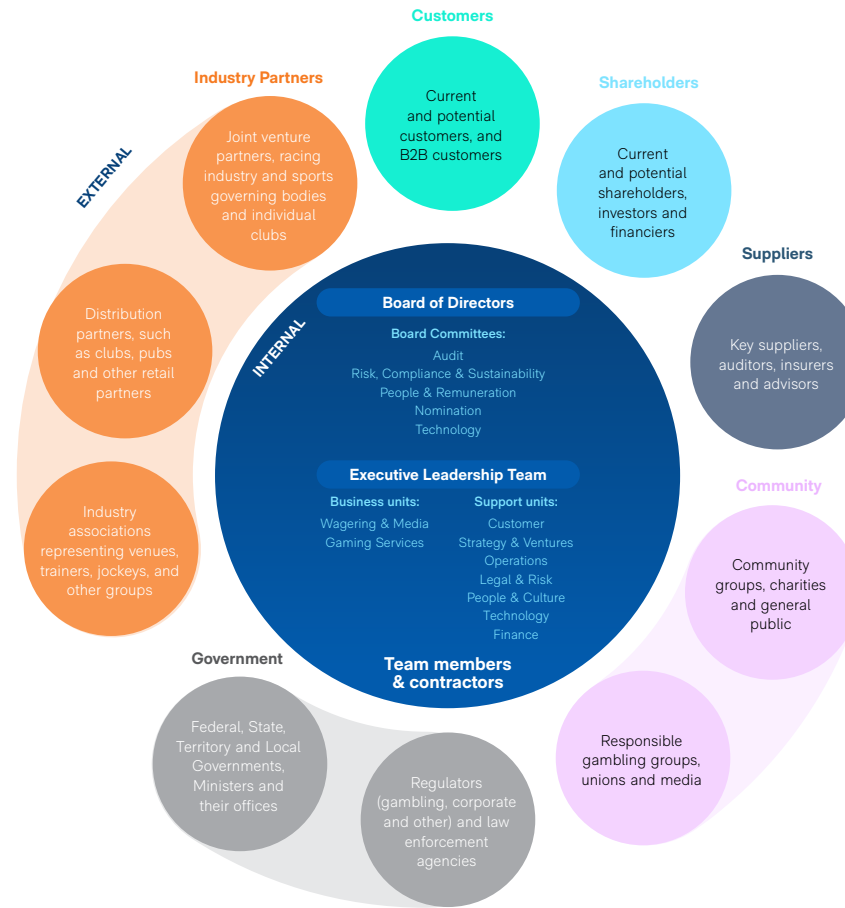
We engage with several stakeholders in addressing modern slavery risks.

We conduct vendor governance meetings with strategic tier one suppliers on a monthly or quarterly basis. Relevant risks, including modern slavery risks, are addressed in these meetings.

We regularly engage with industry partners and associations regarding our Fair Work Compliance program to provide holistic guidance and support to our agencies (**retail partners**) in the administration of their employment obligations.

To increase our understanding of human rights risks and leveraging best practice, we utilise our membership with Procurement Leaders, participation in industry forums and organisations such as the UNGCNA and the NRA, and Sustainability Leaders network to gain access to modern slavery information. This includes risk reporting, case studies, guides, networking groups, supply chain risk mitigation webinars and leadership panels that share insights of what other organisations and peers are doing in relation to modern slavery and human rights issues.

## Our stakeholders



# RISK IDENTIFICATION

We identify and assess risks of modern slavery in our supply chain by actively reviewing country, product, service and industry risk indicators as provided by expert organisations such as the International Labour Organization and the Global Slavery Index. We also take into consideration high risk business models and suppliers that engage and/or employ vulnerable people. Relevant risk factors identified through this process are summarised in the table opposite.

Our team has a strong understanding of the factors that contribute to the risks of modern slavery, and proactively analyse and identify risk areas in our supply chain where modern slavery may exist. These areas include employment arrangements in retail agencies and licensed venues, and within industry partners, labour hire arrangements, as well as direct and indirect procurement of goods, especially goods for end use (eg. uniforms, computer/electronic equipment, etc).

Products such as electronics require a high level of labour to produce, and in many instances this production only takes place in countries which are classified as high risk. Many of the countries our suppliers source those products from do not have a strong rule of law in respect of human rights and therefore reliance on compliance with local legal requirements alone is inadequate to mitigate modern slavery risks.

We know that modern slavery is a symptom of wider human rights vulnerabilities, and we are constantly working to alleviate adverse impacts, as detailed in the next sections of this Statement.

Risk area	Risk factors
<p><b>RETAIL AGENCIES AND LICENSED VENUES</b></p> 	<p>Retail partners may employ migrant workers, people in financial hardship, and underage workers to deliver services related to TAB</p>
<p><b>INDUSTRY PARTNERS</b></p> 	<p>Industry partners may employ or subcontract with entities that employ migrant workers, people in financial hardship, and underage workers to deliver services related to Tabcorp</p>
<p><b>LABOUR HIRE/ SERVICES</b></p> 	<p>Risk that Tabcorp utilises onshore/offshore labour hire firms, vendor resources and contractors across various categories that do not comply with modern slavery obligations. For example, cleaning and maintenance, security, marketing, onshore and offshore technology subcontractors</p>
<p><b>DIRECT AND INDIRECT SOURCING OF GOODS</b></p> 	<p>Supply chain not well understood resulting in component hardware, equipment and merchandising sourced by Tabcorp being manufactured by entities that do not comply with modern slavery requirements</p>

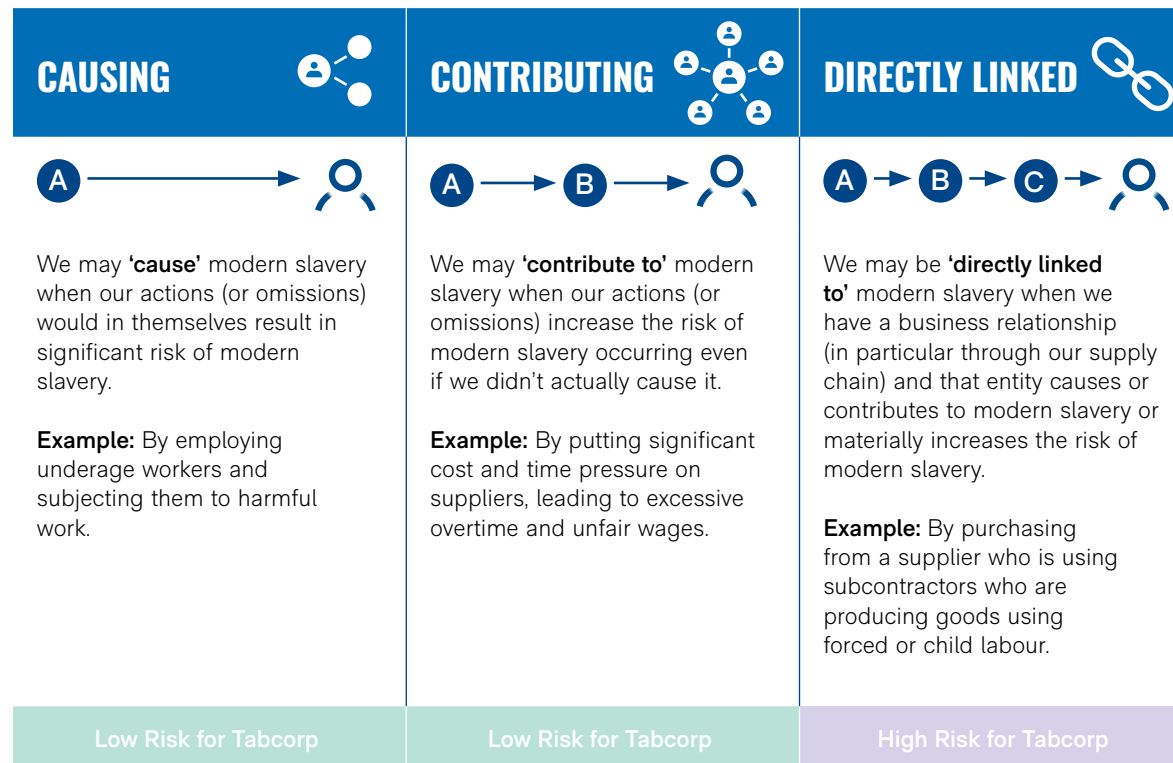
# RISK MANAGEMENT

Our Risk Management Framework, policies and procedures set out the roles, responsibilities and guidelines for managing financial, operational and other risks associated with our business, including human rights and modern slavery risks. The Framework enables the identification, evaluation, monitoring, management, reporting and oversight of risk throughout the Group. When assessing modern slavery risks, we focus on labour risk to people, not just risk to Tabcorp.

Risk assessments of modern slavery in our operations and supply chains considers risks that cause, contribute or are directly linked to modern slavery practices. We assess these risks based on the United Nations Guiding Principles on Business and Human Rights, similar business models, and publicly available information on this topic. Our approach is described in the diagram opposite.

We report human rights and modern slavery risk identification and management information to both the Executive and Board Risk, Compliance and Sustainability Committees. In turn, the Board Risk, Compliance and Sustainability Committee reports to the Board of Directors. All team members are responsible for managing these risks.

We have a cross-functional Modern Slavery SteerCo in place that comprises senior managers from our Procurement, People and Culture, Legal, Retail, Risk and Sustainability teams to better align with our refreshed Sustainability Framework. The SteerCo is sponsored by our Chief Legal and Risk Officer and oversees the implementation of our Responsible Procurement Plan for Modern Slavery, under our Sustainability Framework. The main purpose of this Plan is to enhance our practices related to human rights and better address modern slavery risks.



# OUR OPERATIONS

As of 30 June 2023, Tabcorp employs or engages 3,150 people, of which 941 are casual and 146 are contractors. The remaining 2,063 are directly employed team members (permanent/fixed term). Team members are either covered by enterprise/collective agreements (1,074) or have individual employment contracts.

We also engage 1,175 people hired through third parties. These are vendor resources in professional roles, such as marketing and technology, and are not included in our team member headcount.

We are committed to complying with all applicable laws and regulations with respect to wages, working hours, leave entitlements, superannuation and workers' compensation insurance. We undertake an annual minimum wage review across all our operations to confirm that our team members are compensated fairly and in accordance with relevant awards or enterprise/collective agreements, where applicable.

Tabcorp has reviewed its operations regarding our provision of labour to other organisations and has assessed and taken steps to address any potential risks. Details are outlined in the next section.

## Fair Work Retail Compliance Program

We provide our services through a number of channels including online and through a network of agencies (**retail partners**) across Australia.

We have undertaken work to protect vulnerable workers and prevent potential contraventions of the *Fair Work Amendment (Protecting Vulnerable Workers) Act 2017 (Fair Work Act)* across our retail partners. We have a program in place which assists in promoting compliance with the Fair Work Act regarding minimum rates of pay, awards and enterprise agreements to our retail partners. The program comprises four steps as outlined below.

### STEP ONE: Set expectations

The terms of our contractual agreements with retail partners specify the requirement to comply with workplace laws and Tabcorp's right to audit and access records, where required. Our Operations Manual and other written commitments detail our expectations to comply with workplace laws.

 Permanent/ fixed term team members*	 Casual team members*	 Contractors*	 Covered by enterprise/ collective agreements*	 People hired through third parties
2,063	941	146	1,074	1,175

Data as of 30 June 2023.  
\* Refers to team members directly employed by Tabcorp.

### STEP TWO: Educate and train

We offer templates and guidance materials to our retail partners to promote awareness of obligations and consequences of noncompliance with workplace laws. We train our business development managers to build awareness of our partners' workplace obligations and Tabcorp's role in upholding them.

### STEP THREE: Monitor compliance

We require our retail partners to complete online self audits on their key obligations as employers. We also undertake annual site surveys, which requires the retail partner or their employee to answer a series of brief questions.

These surveys enable us to better monitor the effectiveness of our program by capturing potential noncompliance or information gaps.

We have established a dedicated Retail Workers Hotline, managed independently by Deloitte, to enable our retail partners and their employees to anonymously report suspected noncompliance or concerns regarding their workplace entitlements.

### STEP FOUR: Take further action

We have developed a process and governance framework to respond to known or suspected noncompliance across our retail partners. Our approach is to work collaboratively with retail partners

to confirm understanding of requirements and promote compliance with the Fair Work Act. If we are unable to reach a satisfactory resolution to rectify a breach, we may suspend or terminate an agreement with a retail partner.

During FY23, Tabcorp has not identified any material breaches of the Fair Work Act.

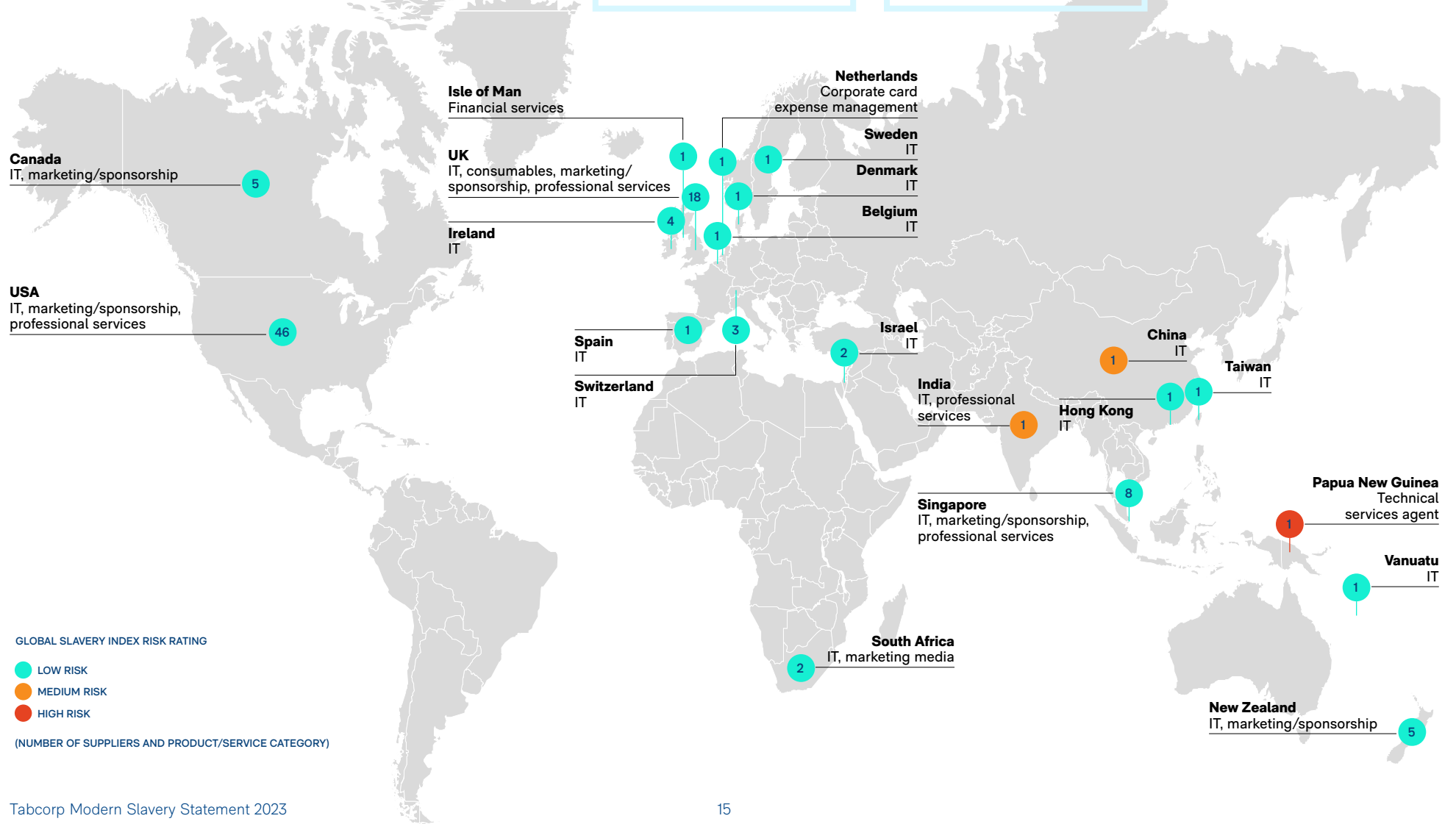
# OUR SUPPLY CHAIN

In FY23, Tabcorp engaged directly with 1,463 suppliers and contractors. Approximately 85% of Tabcorp's FY23 total spend was with 114 suppliers. Our largest category of spend was information and communication technology at 39.3%. This includes items used to develop and manage our systems, hardware and software purchases, and purchases within our Gaming Services business. The remaining 60.7% of procurement spend was on activities including marketing and sponsorship, property, recruitment and professional services, travel and consumables.

Our largest category of spend at  
**39.3%**  
 is on information and communication technology

Of our procurement spend,  
**91.85%**  
 is with Australian suppliers

In FY23, 8.15% of total procurement spend was with 105 international suppliers located outside Australia, and 99.96% of this spend was with suppliers based in countries deemed as low or medium risk for modern slavery according to the Global Slavery Index.



## Supplier risk management and due diligence

We have centralised processes for supplier pre-qualification, onboarding, contracting, monitoring and relationship management. We take this approach for process consistency across the business. We undertake due diligence and risk assessments as part of pre-qualification for all potential suppliers and ongoing sanctions checks for all active suppliers. This process includes assessment for:



**Anti-money laundering**



**Sanctions lists**



**Adverse media monitoring**



**Labour license status**

As part of the supplier onboarding process, all suppliers are required to assess their compliance with our Supplier Code of Conduct and report on any deficiencies or breaches. We may require suppliers to provide evidence of their compliance with the Code or conduct independent compliance audits.

In April 2020, Tabcorp engaged an external consultancy (KPMG) to undertake a modern slavery risk assessment and segmentation of our supply chain. This assessment

prioritised our direct suppliers, based on four risk levels:

1. **High Risk Locations** – where our suppliers or contractors are located.
2. **High Risk Categories** – products and services that use manual, labour intensive, low or base skill labour, such as building services and cleaning.
3. **High Risk Models** – arrangements where we have limited visibility, such as franchising, third party labour arrangements, outsourcing, etc.
4. **Vulnerable People** – groups of people or individuals more likely to be exposed to harm, or unable to advocate for themselves in exploitive situations.

This assessment has been reconstructed in 2023 internally, using a similar framework and an up to date view. It included analysis of the ten countries with highest prevalence of human rights violations and indicated a connection between modern slavery and two major external drivers: highly repressive regimes and conflict. During FY23, we engaged with one supplier located in a country considered high risk, and two suppliers located in countries considered medium risk. This represented 0.001% and 0.2% of our supplier base respectively.

We have adopted active Supplier Relationship Management practices, with an ongoing cycle of continuous evaluation and adaptation to business needs and potential risks. Our suppliers are segmented via a three step process and we propose a plan depending on their performance and the nature of the goods/services being provided. The proposed plan is based on four quadrants of Strategic, Focused, Leveraged and Routine. These quadrants will dictate the frequency of interactions internally and externally, where required, to serve as forums to address challenges, explore improvement opportunities, and discuss any risks, including those related to modern slavery.

## Modern slavery risk in the supply chain

We have assessed the maturity of our existing policies, systems, controls, and remediation mechanisms to identify and manage modern slavery risks. Following this assessment, we developed a long term plan to manage our ongoing modern slavery response.

Last year, we developed a Responsible Procurement Plan for Modern Slavery (**Plan**) to better align with our Sustainability Framework, with the aim to continue to improve our business practices. This year, we continued

to implement this Plan, with the oversight of our Modern Slavery SteerCo.

A Source to Contract roadmap is also in place, as part of our Enterprise resource planning Transformation Program. The roadmap includes uplifting supplier due diligence capabilities by implementing new technology to enhance the supplier risk assessment processes. This technology will replace current supplier pre-qualification checks, Contract Assessment Tool questionnaire and risk assessments. In addition, our Procurement team:

- conducted supplier segmentation and risk assessments analysis, utilising Kearney best practice Supplier Relationship Management tools; and
- created Category Strategies that identify high risk suppliers and demographics of suppliers, size of spend and category of the goods/services.

We have improved our existing risk management and remediation frameworks to mitigate identified risks, as outlined in the following sections.

As part of our Supplier Governance Framework, we regularly engage with suppliers that fall under these priority risk areas. We reiterate our compliance expectations outlined in our Supplier Code

of Conduct and remind them of our shared responsibility to prevent modern slavery and human rights breaches.

This year, we have also introduced independent third party audits on three key suppliers of facilities management, technology services and labour hire. These suppliers were selected based on high risk industries, the Global Slavery Index and assessed against seven key risk criteria.

## Information technology computer and electronic equipment

Information technology is our largest category of spend and is predominately sourced through Australian based suppliers. However, we understand that modern slavery has been publicly reported to be prevalent in many electronics factories, particularly in Asia, where our suppliers may source these products from.

While we may have limited visibility to our suppliers' supply chain and country of origin of these products, we have controls in place to mitigate this risk. For example, we conduct go to market exercises for major purchases, and a series of modern slavery due diligence questions are asked of each supplier as part of the process. The responses to the due diligence questions are reviewed and assessed for risks of modern



## OUR SUPPLY CHAIN CONTINUED

slavery by our category specialists. We also seek to purchase from Australian companies, including CompNow, an Australian company which is a signatory of the Australian Government's mandate for large enterprises to eliminate modern slavery from their supply chains.

### Facilities management

Modern slavery risks lie across categories where there is generally a lower skilled labour force. In our property portfolio, this relates to cleaning, handyman, security and hospitality services, where there has been historical underpayment and overutilisation of such labour resources.

As there is a large downstream subcontractor delivery requirement, we place importance on the robust management of our principal property supplier in managing these delivery needs. This supplier conducts cleaning and facilities management reviews and audits on an annual basis from a supplier and contract manager level, which considers auditing high risk vendors.

To confirm there are no instances of noncompliance with regards to the supply of labour, suppliers are required to confirm the following (as applicable):

- Paying their employees in accordance with the Fair Work Modern Award.
- Adopting the Cleaning Accountability Framework to confirm cleaning employees are properly paid.
- Including compliance with modern slavery requirements in their contractual supplier agreements.
- Utilising leading industry pricing schedule and analytics to confirm that there is no under payment of employees in the delivery of cleaning services.

As part of our due diligence process, we take several additional actions throughout the service delivery lifecycle – from supplier screening and due diligence before onboarding a new supplier, to contract management and monitoring compliance with our Supplier Code of Conduct. These actions help us to proactively manage risks in the supply chain.

### Labour hire

Most of our team members are professionals working in various skilled roles at our corporate

offices, warehouses, and retail partners' venues. From time to time, Tabcorp procures labour hire services to supplement our workforce during peak seasonal events such as the Spring Racing Carnival, when TAB Ambassadors are engaged.

We have risk management processes in place to verify compliance with State Government labour hire licencing schemes, where required. These schemes are designed to bring integrity and scrutiny to the labour hire sector, keep vulnerable workers safe from exploitation and protect them from being underpaid. Under these laws, we must only procure designated labour hire services from licenced providers. Labour hire licences are granted by State based authorities in accordance with legislative criteria, which includes a 'fit and proper person' test and regular reporting obligations.

We regularly assess our supply chain to confirm that all relevant suppliers hold an appropriate labour hire licence. Our due diligence process for new suppliers includes labour hire assessment questions to help us verify that relevant new suppliers are appropriately licenced before we engage them. In addition, supplier terms include obligations to maintain appropriate licences as a condition to do business with us.

## GRIEVANCE MECHANISMS

Consistent with our commitment to maintaining a culture of honesty and integrity, Tabcorp has a Whistleblower Policy and framework in place to help it meet its legal and regularly obligations and to assist anyone who wants to be, and is eligible to be, a whistleblower. It describes how to make a whistleblower report, who a whistleblower report can be made to, how it will be actioned and investigated, and protections and support available to whistleblowers under legislation. The policy applies to current and former directors, officers, team members, contractors, volunteers and suppliers, including employees of contractors and suppliers, of any Tabcorp company and associates of Tabcorp.

Matters can be reported through the Tabcorp Integrity Protection Service (**TIPS**), an independent, anonymous and secure service delivered by Deloitte, or to one of our Whistleblower Report Officers. The whistleblower program is overseen by an internal Whistleblower Committee, which has accountability and a direct reporting line to the Board Audit Committee.

All team members are required to complete annual training on our Whistleblower Policy, as part of our Essential Learning program. Our Whistleblower Policy is also regularly communicated to all team members to raise awareness and explain key features such

as how to make a whistleblower report and the protections available to whistleblowers.

Our Whistleblower Committee received a total of 8 reports during the reporting period, which were assessed and managed in accordance with our Whistleblower program. None of these reports related to potential modern slavery or human rights risks in our operations or supply chain.

We have also established a dedicated Retail Workers Hotline, managed independently by Deloitte, to enable our retail partners' employees to anonymously report suspected noncompliance or concerns regarding their workplace entitlements. Retail partners and their employees can access the service and make a disclosure via:

- A 1800 free call number which is available to receive calls, Monday to Friday, between 6.30am to 5.00pm (excluding all Victorian public holidays).
- A dedicated website which contains information about the service and how retail partners' employees can make a disclosure.

We received one report during FY23 through our Retail Workers Hotline. The report related to provision of payslips to employees. Upon investigation, it was confirmed the agent was complying with requirements and the case was subsequently closed.

## REMEDIATION

We work collaboratively with our suppliers to enhance their understanding and check compliance with our expectations regarding modern slavery and human rights standards.

When we identify a potential modern slavery risk in relation to a supplier, we seek further information and work with them to either mitigate or remove that risk.

We are not aware of any instances of modern slavery in our operations and our supply chain during FY23.

## CAPABILITY BUILDING

We maintain an ongoing focus on responsible procurement, training and capability building of all relevant team members whose purchasing decisions may impact workers' rights and working conditions.

Relevant team members are kept up to date on responsible sourcing and human rights commitments and how actions may impact workers' rights and working conditions through training, information sharing and capability building.

During FY23, we enhanced our capabilities as follows:

- Delivered 'Modern Slavery' Essential Learning module for 2,116 team members across our business. This module outlines the centralised processes to consistently identify, assess and escalate any human rights or modern slavery complaints or concerns. Relevant team members are required to complete the module every year, as part of their regular mandatory Essential Learning cycle.

- Joined the NRA ESG Committee, a forum facilitated by the NRA, where Australian business participants can connect, navigate new developments, share learnings regarding ESG and consider ways to go beyond simple regulatory requirements. ESG topics include human rights and modern slavery.
- Continued to engage with industry partners and associations on a regular basis regarding our Fair Work Compliance program. This engagement helps us provide holistic guidance and support to our retail partners in the administration of their employment obligations.

Looking ahead, we plan to further support our suppliers' awareness of modern slavery risks by developing targeted supplier training on this topic.

### NRA ESG Committee

The NRA ESG Committee brings together key retailers to discuss the implementation and implications of the Act, and other ESG matters. This includes both regulatory and self-regulatory compliance obligations.

The purpose of the committee with respect to Modern Slavery is to:

- Provide feedback to Government as part of the review of the Act.
- Establish and share best practice for industry ethical sourcing programs.
- Share learnings on due diligence and traceability beyond the first tier of supply chains.
- Share best practice and achieve collaboration for remediation of modern slavery incidents.
- Create a retail industry specific platform to collaborate on remediation, audits and grievance mechanisms.
- Consider emerging issues and high risk categories.
- Promote education of suppliers and domestic workers throughout the supply chain.
- Create an Australian retailer agreement in line with eliminating modern slavery.

## EFFECTIVENESS

We continue to assess and monitor the effectiveness of our actions in identifying and managing modern slavery risks. We do this by tracking our actions and outcomes, partnering with suppliers and other external partners, and undertaking regular internal governance and program reviews. We also rely on independent assessments and external independent reviews from professional consultants to assess the quality of our disclosures and our approach to mitigating modern slavery risks.

Some of the key performance indicators (KPIs) we use to assess the effectiveness of our actions include:

KPI	Outcome
Number of modern slavery training and awareness raising programs delivered	Two training programs delivered: <ul style="list-style-type: none"> <li>• Scenarios based training for Procurement and Property teams</li> <li>• Online Modern Slavery Essential Learning module – for all team members at Tabcorp (excluding oncourse casuals)</li> </ul>
Number of team members that completed training on modern slavery	Procurement and Property Team: 35/35 completed via two sessions in August and September 2022  All team members across the business: 2,116 as at 30 June 2023. This represents a 97% completion rate. Current team members (excluding oncourse casuals) are required to complete annually by the end of December  New starters have 30 days to complete this module
Number of grievances raised with modern slavery indicators	0
Contracts that include modern slavery clauses	Tabcorp template procurement agreements include modern slavery clauses. Where Tabcorp negotiates an agreement based on supplier terms, it seeks to ensure appropriate coverage of modern slavery obligations  We conduct vendor governance meetings with strategic tier one suppliers on a monthly or quarterly basis. Relevant risks, including modern slavery risks, are addressed in these meetings
Number of modern slavery cases identified	0
Number of audits and outcomes	We introduced independent third party audits on three key suppliers. These suppliers were selected based on high risk industries, the Global Slavery Index and assessed against seven key risk criteria. Audit results will be reported in our FY24 Statement

We will continue to review and enhance these KPIs and develop additional metrics to assess the effectiveness of our actions, in line with continuous improvement principles.

### Case study

The introduction of an independent third party audits program in FY23 provided us with an opportunity to engage closer with three of our key suppliers. Leading up to the audits, we met with these suppliers' representatives and the audit firm to outline the importance of having the right processes and procedures in place to address the risks associated with modern slavery.

These engagements, combined with the Audit Reports and Corrective Action Plans issued after the audits, provided a number of benefits. It helped us evaluate compliance with, and effectiveness of our Supplier Code of Conduct, while uplifting suppliers' knowledge regarding modern slavery.

## FUTURE PRIORITIES

We remain committed to continuously improving our business practices to address modern slavery. In the next financial year, we will focus on the following initiatives:

- Deliver our Source to Contract roadmap, that includes uplifting supplier due diligence capabilities by implementing new technology to enhance the supplier risk assessment processes. This new digital platform will replace current manual supplier pre-qualification checks, Contract Assessment Tool questionnaire and risk assessments.
- Develop targeted training to our suppliers to improve their awareness and understanding of modern slavery risks, our compliance requirements, their obligations and our escalation process (on hold in FY23 due to competing priorities).
- Continue to improve our diligence process by reviewing our FY23 analysis and risk assessment framework and completing site audits for three selected high risk suppliers.
- Improve mechanisms to measure the effectiveness of our responsible procurement program. This may include reviewing current KPIs and/or adding new ones.
- Implement recommendations identified in the external independent review to further enhance our disclosures, and align with emerging best practice reporting.
- Develop a roadmap for continuous improvement of our response to modern slavery.

## REPORTING ENTITIES

The following Tabcorp entities are considered reporting entities under the Act in respect of FY23 and are covered by this Statement.

Reporting entity	ABN	Principal activity
<b>Tabcorp Holdings Limited</b>	66 063 780 709	The ultimate holding company of the Group, which is publicly listed on the Australian Securities Exchange
<b>Tabcorp Assets Pty Ltd</b>	73 064 303 920	The primary employing entity and contracting party for procuring goods and services for the Group
<b>Tabcorp Finance Pty Ltd</b>	74 108 197 084	Facilitates the Group's financing activities and is a holding company for some of the Group's wagering and media operations
<b>Tabcorp International Pty Ltd</b>	26 006 574 652	Operates computer simulated racing products and is the holding company for the Group's non-Australian operations
<b>Tabcorp Wagering (Vic) Pty Ltd</b>	37 134 587 107	Operates wagering in Victoria
<b>Tabcorp Wagering Participant (Vic) Pty Ltd</b>	59 154 418 489	Party to the joint venture that conducts the Victorian wagering business
<b>Tab Limited</b>	17 081 765 308	Operates wagering in New South Wales
<b>Tabcorp International No. 4 Pty Ltd</b>	41 146 788 614	The holding company for the Premier Gateway International business located in Isle of Man
<b>Sky Channel Pty Ltd</b>	77 009 136 010	Operates television and radio broadcasting services
<b>Tabcorp Maxgaming Holdings Limited</b>	19 108 686 040	A holding company for wagering and gaming services operations
<b>UBET QLD Limited</b>	84 085 691 738	Operates wagering in Queensland
<b>Maxgaming Holdings Pty Ltd</b>	86 079 909 541	The intermediate holding company for gaming services operations

## CONSULTATION AND APPROVAL PROCESS

We took a collaborative approach and followed a consultative process in preparing this Statement.

Our Company Secretary team led the development of this Statement, with the input from our Modern Slavery SteerCo. The SteerCo consists of representatives across relevant functions within our business who meet regularly to discuss and align on the risks and activities taking place within our operations and supply chain, as detailed in this Statement.

The consultation process across Tabcorp and its reporting entities included engagement with members of senior management heading every relevant function within Tabcorp, the Executive Leadership Team and the Directors of the reporting entities within the Group as at the date of this Statement.

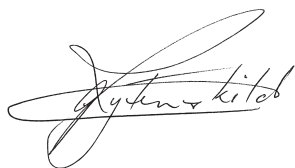
# STATEMENT ANNEXURE

## Principal governing body approval

This Statement was approved by the principal governing body of Tabcorp Holdings Limited, as defined by the Act, on behalf of all reporting entities specified in this Statement on 7 December 2023.

## Signature of responsible member

This Statement is signed by a responsible member of the Tabcorp Holdings Limited Board of Directors, as defined by the Act.



**Adam Rytenschild**  
Managing Director and  
Chief Executive Officer

## Mandatory criteria reference table

The following table indicates the page numbers of the Statement where each of the mandatory criteria in section 16 of the Act is addressed.

Mandatory criteria	Page number
a. Identify the reporting entity	2
b. Describe the reporting entity's structure, operations and supply chains	4–5, 14–16
c. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	12–17
d. Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes	16–18
e. Describe how the reporting entity assesses the effectiveness of these actions	19
f. Describe the process of consultation on the development of the Statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entities covered by the Statement)	20
g. Any other information that the reporting entity, or the entity giving the Statement, considers relevant	7–10

# FORWARD-LOOKING STATEMENTS

This Report contains forward-looking statements (**Statements**) in relation to Tabcorp and its controlled entities (**Group**). This includes statements regarding the Group's intent, belief, goals, objectives, opinions, initiatives, commitments, or current expectations with respect to the Group's business and operations, market conditions, results of operations and financial conditions, and risk management practices.

Examples of these Statements include words such as 'estimate', 'plan', 'will', 'anticipate', 'may', 'believe', 'should', 'expect', 'intend', and other similar expressions.

Any Statements are based on the Group's current knowledge and assumptions, including financial, market, risk, regulatory and other relevant environments that will exist and affect the Group's business and operations in the future. The Group does not give any assurance that the assumptions will prove to be correct.

These Statements involve known and unknown risks, uncertainties and assumptions that could cause the actual results, performances or achievements of the Group to be materially different from the relevant Statements.

We caution readers not to place undue reliance on these Statements. Except as required by applicable laws or regulations, the Group does not plan to publicly update, review, or revise any of the Statements or to advise of any change in assumptions on which any such Statement is based.

## Registered Office

Tabcorp Holdings Limited  
Level 19, Tower 2  
727 Collins Street  
Docklands VIC 3008 Australia  
Telephone 03 9246 6010  
Facsimile 03 9246 6684  
Email [enquiries@tabcorp.com.au](mailto:enquiries@tabcorp.com.au)

## Website

[www.tabcorp.com.au](http://www.tabcorp.com.au)

## Follow us on social media



## Feedback

To ask questions or provide feedback about this Statement and our practices regarding human rights and addressing modern slavery, please email [sustainability@tabcorp.com.au](mailto:sustainability@tabcorp.com.au).