

WE'RE RAISING THE GAME



Modern Slavery Statement
2024

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. It 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). This includes 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. The Statement covers the financial year ended 30 June 2024 (**FY24**) and outlines the Group's actions in identifying and addressing the potential risk of modern slavery in our operations and supply chain. It also sets out how we assess the effectiveness of our actions to address modern slavery.

We take a consolidated, whole-of-group approach to addressing human rights and modern slavery. 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 our controlled entities is available on pages 126 and 127 of our 2024 Annual Report. A list of Tabcorp's entities that are considered reporting entities under the *Modern Slavery Act 2018 (Cth)* (**Act**) is available in the Reporting Entities section of this Statement. 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.

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WE SUPPORT



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.

CHAIRMAN'S MESSAGE



At Tabcorp, we're committed to doing what's right for our people, customers, communities and business partners. One of our Values is **Play Fair**, which underpins how we treat others with respect and dignity. This also supports us to promote human rights and address the risks and impacts of modern slavery.

We have a joint responsibility to protect our people, our community, and the workers in our supply chains and remain committed to ethical, sustainable and socially responsible business practices to fulfill this responsibility.

This year, we continued our efforts to understand modern slavery risks in our operations and supply chains more deeply and assist our team members and suppliers to identify and manage these risks.

We progressed our Responsible Procurement Plan for Modern Slavery and completed an external independent review to assess the quality of our disclosures and our approach to mitigating modern slavery risks. Following this review, we developed a new Anti-Modern Slavery Strategy and Roadmap to improve our actions and reporting practices in this area.

We completed independent third party audits on key suppliers, developed targeted anti-modern slavery training to our suppliers, and continued to build internal capability and understanding of modern slavery risks.

We were pleased to receive a 'A' rating from Monash University for the quality of our FY23 Modern Slavery Statement, in their report released in November 2024¹. We were also pleased to receive a five star rating and be ranked third in the RMIT's Sustainable Procurement Disclosure Index (SPDI) 2024².

We've made good progress but recognise that there is more to be done. We will continue to collaborate with our partners and keep learning and improving, so we can continue to **Raise the Game** and set the benchmark for sustainability in our industry.

Brett Chenoweth
Chairman

4 December 2024

1. Pham, N., Cui, B., & Ruthbah, U. (2024) Modern Slavery Disclosure Quality Ratings: ASX100 Companies Update 2024 [Research brief]. Monash Centre for Financial Studies, Monash Business School. DOI: 10.26180/27645072.
2. The SPDI assesses the level of transparency of ASX 200 businesses in reporting their sustainable procurement practices.

ABOUT TABCORP

OUR OPERATIONS

We're a public company listed on the Australian Securities Exchange (ASX: TAH), with corporate offices in Melbourne, Sydney and Brisbane.

We operate a portfolio of leading Australian brands across wagering, media and integrity services, with national scale and reach.



DIGITAL

RETAIL AND ON-COURSE
~4,000 TAB VENUES³

VISION

We also operate complementary international wagering and broadcasting businesses.

Media broadcasting to 50+ countries	Media distribution and licensed tote provider in USA	Wagering pooling hub in Isle of Man

3. TAB venues include agencies, hotels, pubs, clubs and on-course.

OUR BRANDS



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.



Premier Gateway International is one of the largest global wagering and tote pooling hubs, based in the Isle of Man.



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



MAX is Australia's leading gaming services provider, offering electronic gaming machine monitoring and related integrity services, and other gaming-related services to venues.



Sky Racing World is a US-based distributor of international racing content and facilitator of associated tote pools.

OUR VALUES



We disrupt and spark change to make it better



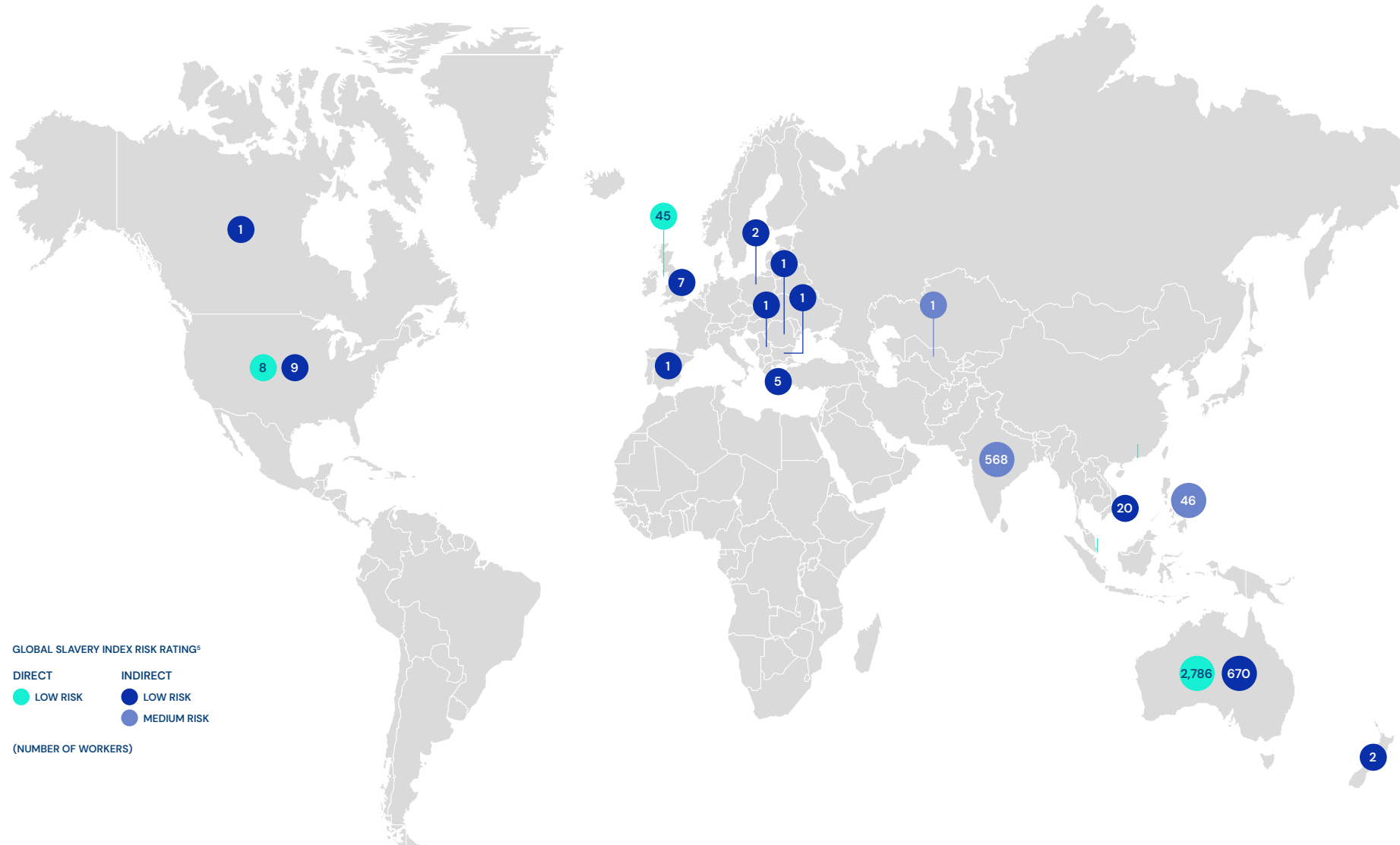
We do what's right for our customers, partners, and each other, always



We bring our passion and have fun doing what we love

OUR WORKFORCE

As of 30 June 2024, we directly employ or engage 2,839 team members (direct workforce). We also engage 1,335 people hired through third parties (indirect workforce⁴).



4. Indirect workforce refers to vendor resources (hired through third parties). Refer to page 13 for additional information.

5. The Global Slavery Index is a national breakdown of the extent of modern slavery in 160 countries. This document is produced annually by human rights group Walk Free.

ABOUT TABCORP CONTINUED

OUR SUPPLY CHAIN

We provide our wagering services through a number of channels including online and through a network of agencies (retail partners), venues and on-course across Australia. We also source products and services from suppliers and contractors locally and from overseas. In FY24:

We engaged directly with 1,012 suppliers and contractors.

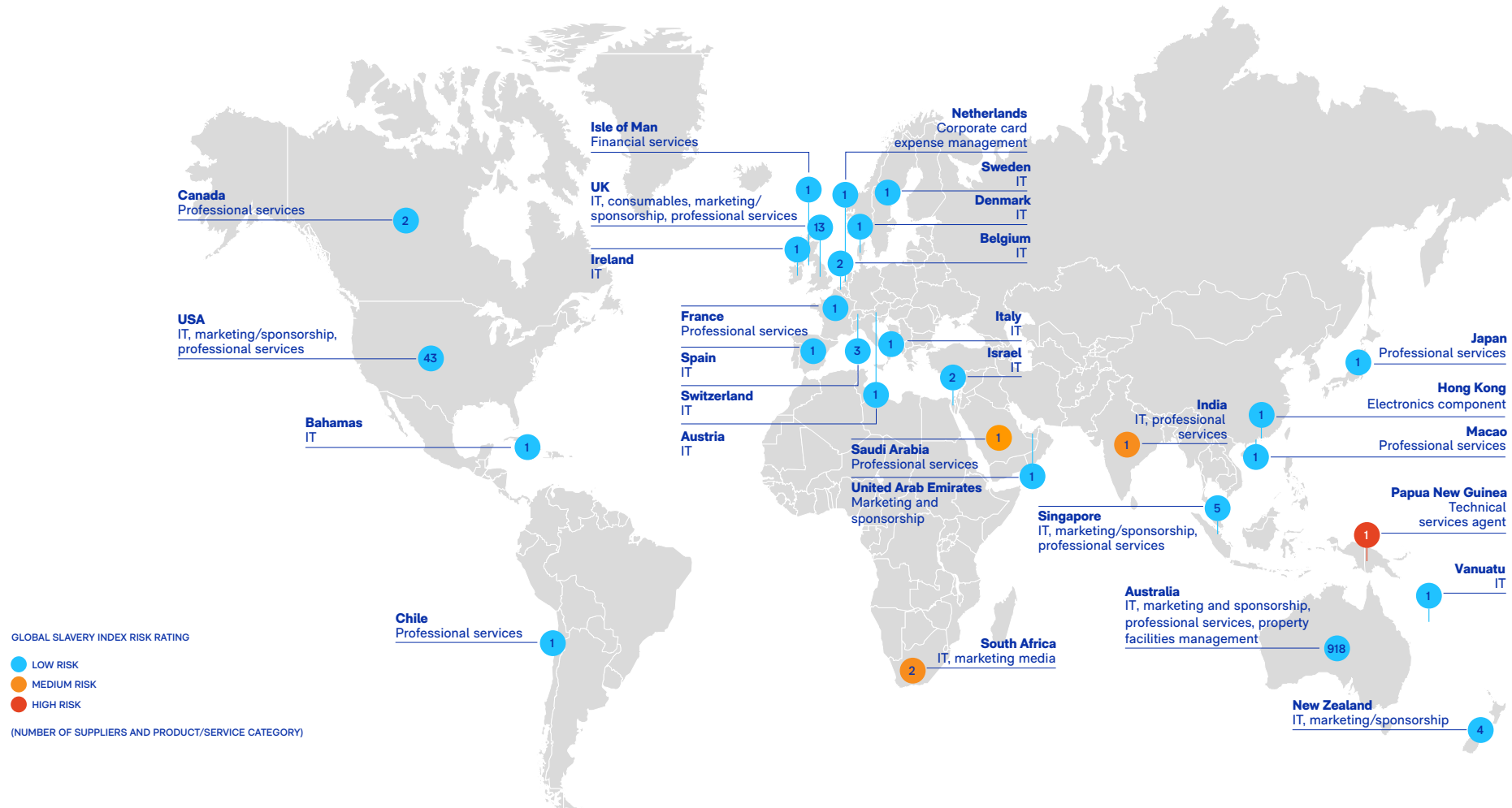
Approximately 85% of our total spend was with 107 suppliers.

Our largest category of spend was information and communication technology at 43%. This includes items used to develop and manage our systems, hardware and software purchases, and purchases within our Gaming Services business.

57% of the remaining procurement spend was on marketing and sponsorship, property, recruitment and professional services, travel and consumables.

6.8% of total procurement spend was with 94 international suppliers located outside Australia. 99.99% of this spend was with suppliers based in countries deemed as low or medium risk for modern slavery according to the Global Slavery Index.













We engaged with one supplier located in a country considered high risk, and four suppliers located in countries considered medium risk. This represented 0.01% and 0.1% of our supplier base respectively.



SUSTAINABILITY FRAMEWORK

Respecting human rights and standing against modern slavery is critical to achieving our vision of *Raising the Game* 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 below).

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

Our detailed ESG approach and performance is set out in our 2024 Sustainability Report available at www.tabcorp.com.au/sustainability



Received a
5 STAR RATING
and ranked 3rd in RMIT's Sustainable Procurement Disclosure Index (SPDI) 2024⁶








Received a
'A' RATING
from Monash University for the quality of our FY23 Modern Slavery Statement, in their report released in November 2024⁷

6. The SPDI assesses the level of transparency of ASX 200 businesses in reporting their sustainable procurement practices.
7. Pham, N., Cui, B., & Ruthbah, U. (2024) Modern Slavery Disclosure Quality Ratings: ASX100 Companies Update 2024 [Research brief]. Monash Centre for Financial Studies, Monash Business School. DOI: 10.26180/27645072.

ANTI-MODERN SLAVERY STRATEGY

During the year, we progressed our Responsible Procurement Plan for Modern Slavery (RPPMS) and developed a new Anti-Modern Slavery Strategy and Roadmap (**Strategy**) to improve our actions and reporting practices in this area. The Strategy followed Deloitte's independent review of our 2023 Modern Slavery Statement and replaced our RPPMS.

A high level overview of the Strategy, and our progress during FY24 is outlined opposite.

OUR GOAL	Build a sustainable future by sourcing products and services responsibly and sustainably						
OUR COMMITMENT	We're committed to identify, prevent and mitigate modern slavery risks across our operations and supply chains. We do this through effective governance and risk management, in partnership with our key stakeholders						
STRATEGIC PILLARS	<p>Due Diligence and Responsible Sourcing > Risk Management > Stakeholder Engagement and Education > Effectiveness > Continuous Improvement</p>						
KEY STRATEGIC INITIATIVES	 Supply Chain and Operational Risk Assessment	 Source to Contract Roadmap	 Audits	 Policy Reviews	 Capability Uplift	 KPIs Review	 Reporting Uplift
FY24 PROGRESS	Continued to improve our due diligence process by reviewing our FY23 analysis and risk assessment framework	Delivered Source to Contract roadmap. The roadmap includes uplifting supplier due diligence capabilities by implementing new technology to enhance the supplier risk assessment processes. This new digital platform replaces current manual supplier pre-qualification checks, Contract Assessment Tool questionnaire and risk assessments	Completed independent third party audits on three key suppliers. These suppliers were selected based on high risk industries, the Global Slavery Index and our seven key modern slavery scoring criteria ⁸	Updated relevant policies to include a reference to our Human Rights Policy	Developed targeted training to our suppliers to improve their awareness and understanding of modern slavery risks, our compliance requirements, their obligations and our escalation process	Reviewed KPIs used to measure the effectiveness of our actions to address modern slavery	Completed external independent review with Deloitte to assess the quality of our disclosures and our approach to mitigating modern slavery risks. Started implementing recommendations identified by Deloitte to further enhance our disclosures and align with emerging best practice reporting

8. Our seven key modern slavery scoring criteria are outlined in the Modern slavery risk in the supply chain section on page 18.

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.

We report our progress quarterly through these Committees, and annually in this Statement. A summary of our governance framework is outlined in the table opposite.

BOARD	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	
BOARD RISK, COMPLIANCE AND SUSTAINABILITY COMMITTEE	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	
MANAGEMENT OVERSIGHT	<p>CEO and Executive Leadership Team</p> <p>Accountable for managing modern slavery risks and the overall implementation of our Sustainability Framework</p>	<p>Supported by Executive Risk, Compliance and Sustainability Committee</p>
COORDINATION AND REPORTING	<p>Company Secretary and Sustainability Team</p> <p>Responsible for developing and reviewing the Sustainability Framework, supporting the preparation of the Anti-Modern Slavery Strategy and Roadmap, tracking progress, and coordinating the preparation of our Modern Slavery Statement</p>	<p>Supported by Modern Slavery SteerCo and independent professional advisers, as required</p>
EXECUTION	<p>Business and functional units</p> <p>Responsible for executing the Anti-Modern Slavery Strategy and Roadmap, identifying and managing modern slavery risks, and reporting progress</p>	<p>Supported by policies and procedures, as approved by the Executive Leadership Team and the Board</p>

POLICY FRAMEWORK

We have 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
Tabcorp Code of Conduct	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
Supplier Code of Conduct	<p>Outlines the expectations we have of our suppliers across six areas:</p> <ul style="list-style-type: none"> • Integrity, ethics and corporate conduct • Corporate governance • Labour and human rights • Privacy and cyber security • Health, safety and wellbeing • Environmental management
Human Rights Policy	Formalises our commitment to respecting the human rights of the people we interact with and who are impacted by our business operations and relationships
Whistleblower Policy	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
Inclusion and Diversity Policy	Sets out our commitment to a culture of inclusion and the creation of a bias free workplace where all are welcomed and respected
Workplace Health, Safety and Wellbeing Policy	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
Talent Acquisition Policy	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
Procurement Policy	Sets out our approach to procuring goods and services, including individual's 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
Anti-Money Laundering and Counter-Terrorism Financing Policy (AML/CTF)	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
Anti-Bribery and Corruption Policy	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
Sanctions Policy	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
Respect@Work Position Statement	Formalises our commitment to providing a workplace free from sexual harassment, sex-based harassment, discrimination and other inappropriate behaviour
Domestic and Family Violence Support Policy	Provides a framework to support team members who are affected by situations of domestic and family abuse or violence, so they feel supported and are able to come forward for help and continue to participate in the workplace

A number of these policies are available from the Tabcorp website at 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 the Statement.

STAKEHOLDER ENGAGEMENT

We engage and collaborate with several stakeholders to address modern slavery, improve our knowledge and leverage best practice reporting. A list of our stakeholders, examples of how we engage with them and topics of interest identified through our materiality assessment process, are outlined on page 11 of our 2024 Sustainability Report.

We maintain memberships or representation of industry groups, professional associations and advisory bodies. During FY24, these memberships and forums included:

	Procurement Leaders	Procurement Leaders is a global community of procurement professionals that provides strategy development and peer-to-peer benchmarking for professionals in this area. This membership provides access to cutting-edge research, guidance and an expert network of professionals. This network allows us to share learnings and resources regarding sustainable procurement and modern slavery risks
	Fintel Alliance	The Fintel Alliance is AUSTRAC's public-private partnership that brings together financial crime intelligence professionals and law enforcement agencies to collaborate on solutions to combat serious and organised crime, including child sexual exploitation and forced sexual servitude
	United Nations Global Compact Network Australia (UNGCNA) Community of Practice	The UNGCNA Community of Practice is a peer-to-peer network that enables participants to share learnings and practices about modern slavery reporting and risk management
	National Retail Association (NRA) ESG Committee	The NRA ESG Committee is a forum where 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
	Association of Certified Anti-Money Laundering Specialists (ACAMS)	The ACAMS is the largest international membership organisation for Anti-Financial Crime professionals. It aims to advance the professional knowledge, skills and experience of those dedicated to the prevention and detection of financial crime, including proceeds of crime from modern slavery and human trafficking, and child exploitation
	Sustainability Leaders Network	We're part of an informal peer-led network of sustainability professionals who work together to advance sustainable practices and ESG disclosures. Through monthly meetings, this cross-sector collaboration enables the sharing of best practices and discussion of innovative solutions for achieving sustainability goals. Topics of discussion include climate change, human rights and modern slavery

 We conduct vendor governance meetings with strategic 1st tier 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 retail partners in the administration of their employment obligations

RISK IDENTIFICATION

We monitor modern slavery risks through a combination of supplier screenings, risk assessments, audits, grievances management, team member insights, regulatory trends, industry insights, media screening, civil society reports, and engagement with human rights professionals and non-government organisations. These diverse sources help us identify and prioritise our response to the most salient human rights risks, including emerging risks.

Our operations

Direct workforce

Our commitment to respecting human rights starts with our team.





As of 30 June 2024, we directly employ or engage:



Our team members are either covered by enterprise/collective agreements (32%) or have individual employment contracts.

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

We support our people to succeed and offer a number of additional benefits, including learning and development options, generous leave policies, flexible work policy and a great reward and recognition program. Team members also have access to a range of discounts, offers and a leading health and wellbeing app. These additional benefits are summarised below:

 INCLUSION AND DIVERSITY	 TEAM MEMBER BENEFITS	 WELLBEING	 COMMUNITY
<ul style="list-style-type: none"> Gender affirmation support Inclusion and diversity programs and activities Cultural leave 	<ul style="list-style-type: none"> Supportive and flexible work practices, bonus leave and 18 weeks of paid parental leave for all new parents Learning and development programs Corporate discounts Employee share scheme 	<ul style="list-style-type: none"> Domestic and family violence support Free confidential external support services Wellbeing programs and activities Flexible leave, including flexible public holiday leave Recognition Program 	<ul style="list-style-type: none"> Team member and community engagement program Matched fundraising Community volunteering Volunteer leave

RISK IDENTIFICATION CONTINUED

Based on our profile, we consider that the inherent risk of modern slavery in our direct workforce is low. We have strong policies, communications channels, ongoing monitoring, team member training and accessible grievance mechanisms to mitigate the risk of modern slavery in our operations.

We have onboarding controls in place to reduce the risk that we could inadvertently employ individuals that are under the minimum working age, or without the appropriate visa status or conditions. For example, an underage candidate would be identified through our recruitment screening process, including through the interview stage or completion of employment forms.

Indirect workforce





We engage 1,335 people hired through third parties. These are vendor resources in professional roles, such as IT, marketing and finance, and are not included in our team member headcount.

These workers are engaged through vendors based in Australia, with service delivery taking place from local and offshore offices of these vendors, as summarised on page 5.

The inherent risk of modern slavery for our indirect workforce is higher than for our direct workforce. This is because some of the offshore vendor offices are located in countries with weaker legal and governance standards. We seek to address this risk by adopting a robust risk management framework, as outlined in the Supplier risk management and due diligence section.













Our supply chain

We identify and assess risks of modern slavery in our supply chain by actively reviewing a number of risk factors, as provided by expert organisations such as the International Labour Organization and the Global Slavery Index. These risk factors are outlined opposite.





 LOCATION	 CATEGORY	 BUSINESS MODEL	 VULNERABLE GROUPS
Countries or regions considered to have higher human rights (including modern slavery) risks	Categories of products, services and industry sectors regarded as having more significant inherent modern slavery risks	Business models structured around high risk work practices or complex supply chain arrangements	Individuals or groups more likely to be exposed or susceptible to harm, or unable to advocate for themselves in exploitative situations
Modern slavery risk is often higher in geographies with weak governance (including weak rule of law and corruption), high rates of conflict, displacement or contested land use, a record of State failure to protect human rights, and remote or isolated areas with limited access to social or economic support and infrastructure	Modern slavery risk is often higher for certain categories of products, raw materials, services and industry sectors (such as electronics products and manufacturing), due to their operational and supply chain models, workforce structure and characteristics, and the geographies in which they operate or source from	Modern slavery risk is often higher within business models that are reliant on high risk work practices or complex supply chain arrangements that introduce a layer of aggressive pricing or time pressures, precarious work demands, or with poor recruitment practices and working conditions	Certain individuals or groups may be more vulnerable to experiencing modern slavery. This might be influenced by socio-demographic and geographic factors such as cultural and language barriers, level of education and literacy, visa insecurity, residency or citizenship status, gender, age, disability and remoteness or isolation

RISK IDENTIFICATION CONTINUED

Our team proactively analyses and identifies 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 such as uniforms, computers, solar panels and electronic equipment. This year we've also considered risks related to our customers and community, as summarised in the table opposite, and further described in the next sections.

Risk area	Risk rating	Risk factors	Risk mitigation
 RETAIL AGENCIES AND LICENSED VENUES		Retail partners may employ migrant workers, people in financial hardship, and underage workers to deliver services related to TAB	Fair Work Retail Compliance Program and Retail Workers Hotline
 INDUSTRY PARTNERS		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	Regular engagement with industry partners and whistleblower program
 LABOUR HIRE/ SERVICES		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	Modern slavery contractual clauses requiring compliance with our policies and codes, including Human Rights Policy and Supplier Code of Conduct, regular engagement and risk assessment/due diligence with labour hire firms, vendor resources and contractors; supplier training; independent audit program; whistleblower program. AML/CTF programs are also in place, which include adverse media and WorldCheck ⁹ screening of our suppliers
 DIRECT AND INDIRECT SOURCING OF GOODS		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. This risk is higher for branded products/merchandise	Modern slavery contractual clauses requiring compliance with our policies and codes, including Human Rights Policy and Supplier Code of Conduct; regular engagement and risk assessment/due diligence with suppliers; supplier training; independent audit program; whistleblower program. AML/CTF programs are also in place, which include adverse media and WorldCheck screening of our suppliers
 CUSTOMERS		Risk that we may have individual customers (and/or their immediate families) who are vulnerable to modern slavery through their personal circumstances. Risk that customers misuse our products or services to facilitate or benefit from modern slavery, including human trafficking and child sexual exploitation	We provide training and education for relevant team members to identify signs of modern slavery, and a whistleblower program is in place. AML/CTF programs are also in place, which include adverse media screening, customer verification and screening, and transaction monitoring
 COMMUNITY		Our sponsorships, partnerships, or charitable donations may support organisations connected to modern slavery, in particular where these organisations operate in or source from industries or countries that have a higher modern slavery risk	Supplier Code of Conduct and whistleblower program are in place

Risk Rating Key:

-  High
-  Significant
-  Medium
-  Low

9. WorldCheck is an AML/CTF watchlist datafile, provided by the London Stock Exchange Group. Reports of individuals and companies suspected, accused, arrested or convicted of modern slavery offences are included in WorldCheck. We screen our suppliers against that datafile on a daily basis.



The link between money laundering and modern slavery

Money laundering and modern slavery are two interconnected crimes that pose significant threats to societies across the world. Criminals often use money laundering to fund their illicit activities, including human trafficking and sexual exploitation.

Illicit financial flows enable criminals to pay for the costs associated with trafficking, including recruitment, transportation, and exploitation. The funds are also used to bribe officials and pay off debt bondage, which can keep victims trapped in a cycle of abuse.

We have robust anti-money laundering and counter-terrorism financing (**AML/CTF**) programs in place to reduce the risk of having illicit funds flowing through the provision of our products and services undetected.

We also engage with the Australian Transaction Reports and Analysis Centre (**AUSTRAC**) at multiple levels and on a regular basis to update the regulator on our AML/CTF programs and share intelligence.

Detailed information about our AML/CTF program is available on page 59 of our 2024 Sustainability Report.



When domestic and family violence becomes modern slavery

Domestic and family violence is behaviour that coerces, controls or causes a person to be afraid. It includes many forms of violence that cause lasting harm to people, including some that are considered forms of modern slavery.

Modern slavery can involve violence, abuse and/or exploitation in family and domestic settings, for example, in cases of forced marriage and domestic servitude. This can happen when the victim loses all freedoms, such as being allowed out unsupervised, and not holding a bank account or phone. Once these freedoms are lost it becomes modern slavery.

We support organisations that bring awareness and provide support to people experiencing domestic violence. This year, we partnered with DV Safe Phone for a phone collection drive at our offices nationwide during the 16 Days of Activism Against Gender-Based Violence. The collected devices were donated to survivors of domestic violence.






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 aims to enable the identification, evaluation, monitoring, mitigation, management, reporting and oversight of risk throughout the Group. When assessing modern slavery risks, we consider the risk to both people and to Tabcorp.

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

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

We have a cross-functional Modern Slavery Steering Committee (SteerCo) in place that comprises senior managers from our Procurement, People and Culture, Legal, Retail, Risk and Sustainability teams to better align with our Sustainability Framework. The SteerCo is sponsored by our Chief Risk Officer and oversees the implementation of our Anti-Modern Slavery Strategy and Roadmap.

CAUSE	CONTRIBUTE 	DIRECTLY LINKED 
<p></p> <p>We may 'cause' modern slavery when our actions (or omissions) would in themselves result in significant risk of modern slavery.</p> <p>Example: By employing underage workers and subjecting them to harmful work.</p>	<p></p> <p>We may 'contribute to' modern slavery when our actions (or omissions) increase the risk of modern slavery occurring even if we didn't actually cause it.</p> <p>Example: By putting significant cost and time pressure on suppliers, leading to excessive overtime and unfair wages.</p>	<p></p> <p>We may be 'directly linked to' modern slavery when we have a business relationship (in particular through our supply chain) and that entity causes or contributes to modern slavery or materially increases the risk of modern slavery.</p> <p>Example: By purchasing from a supplier who is using subcontractors who are producing goods using forced or child labour.</p>
Low Risk for Tabcorp	Low Risk for Tabcorp	High Risk for Tabcorp

RISK MANAGEMENT CONTINUED

Fair Work Retail Compliance Program

We provide our services online and through a network of 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:



STEP 1 SET EXPECTATIONS	STEP 2 EDUCATE AND TRAIN	STEP 3 MONITOR COMPLIANCE	STEP 4 TAKE FURTHER ACTION
<p>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.</p>	<p>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.</p>	<p>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 employees 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.</p> <p>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 workplace entitlements.</p>	<p>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.</p>

We have not identified any material breaches of the Fair Work Act during FY24.

RISK MANAGEMENT CONTINUED


Supplier risk management and due diligence

We have centralised processes for supplier onboarding pre-qualification, 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, we conduct thorough due diligence and risk assessments for all potential suppliers to identify and mitigate risks, including modern slavery risks. During onboarding, suppliers are also required to evaluate their alignment with our Supplier Code of Conduct, reporting any


deficiencies or breaches. In some cases, we may request suppliers to provide evidence of their compliance or submit independent compliance audits to verify adherence to our standards. Once a supplier is onboarded, we implement ongoing sanctions checks for all active suppliers to monitor compliance.


We have adopted active Supplier Relationship Management practices that prioritise continuous evaluation and adaptation to evolving business needs and emerging risks.


We segment our suppliers using a three-step process that considers several critical factors, including:


- 1. Risk profile:** The potential risks associated with the supplier, particularly in areas like human rights and modern slavery.
- 2. Business criticality:** The strategic importance of the supplier's goods or services to our operations.
- 3. Performance evaluation:** Ongoing assessment of the supplier's ability to meet contractual and ethical obligations.

Based on this segmentation, suppliers are placed into one of four quadrants:

 **Platinum** Critical suppliers with high business impact

 **Gold** Key suppliers with moderate risk but important relationships

 **Silver** Suppliers with significant spend but low complexity

 **Bronze** Suppliers providing low risk, transactional goods or services

The quadrant-based approach dictates the frequency and depth of our team interactions with our suppliers. This structured engagement serves as a platform to address challenges, explore improvements, and proactively manage risks, including any that may arise related to modern slavery.

Modern slavery risk in the supply chain

We are committed to addressing modern slavery risks in our supply chain. After assessing the maturity of our current policies, controls, and remediation mechanisms, we developed a long term plan to enhance our approach to managing these risks.

This year, we launched an Anti-Modern Slavery Strategy and Roadmap (**Strategy**) to further improve our business practices.

A key part of the Strategy is our Source-to-Contract Roadmap, which includes the implementation of new technology to enhance supplier due diligence assessments. This system replaces manual pre-qualification checks, Contract Assessment Tool questionnaires, and risk assessments, providing greater efficiency and improved supplier risk management.

In addition to supplier segmentation and regular risk assessments, we have adopted a best practice Supplier Relationship Management (**SRM**) Framework. The SRM Framework allows us to take a holistic view of our supplier relationships while also focusing on the key risks associated with modern slavery. It incorporates seven key modern slavery scoring criteria, as outlined opposite.



High risk supplier locations



High risk supplier categories



High risk supplier models



Suppliers employing vulnerable people



Suppliers who have had a prior scrutiny or legal action



Seasonal or sporadic events



Areas of high labour turnover

RISK MANAGEMENT CONTINUED

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 completed independent third party social audits on three key suppliers of facilities management, technology services and labour hire. These suppliers were selected based on the results of our risk assessment.

The audits were conducted by LRQA, a leading provider of sustainability and supply chain services, using an iteration of the LRQA Responsible Sourcing Assessment standard¹⁰ that focuses on service-oriented companies. The audits included management interviews, documents and policies review, worker interviews, and visual observation in a process conducted by auditors in Australia.

While the results of the audits did not identify any modern slavery practices, they reported minor findings in relation to written policies and OH&S management systems. These findings were addressed through corrective action plans, requiring the three suppliers to clearly define supervision responsibilities between the relevant parties and requiring workers to fully understand the policies and standards they are expected to follow.

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 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.

Our top 65 technology suppliers have been assessed for compliance through revision of their Modern Slavery Statements and Supplier Management Reviews.

Managing modern slavery risks in the procurement of solar panels



The solar panel industry is considered high risk in relation to modern slavery. This is because a large percentage of the world's polysilicon, a crucial material in modern-day solar panels, comes from Xinjiang in China, where there is the alleged link to forced labour practices.

We've made commitments to achieve Net Zero emissions by 2050, and this will require the ongoing procurement of renewable electricity equipment, including solar panels. We are taking steps to both address modern slavery risks and deliver on our environmental commitments.

During the year, we initiated the procurement process for a solar system in our Frenchs Forest media facility in NSW. This process took into consideration modern slavery risks and included a robust due diligence process prior to formal engagement.

We worked with the supplier (1st tier) to confirm that their practices were consistent with our requirements and expectations and assessed the supplier's supply chain (2nd tier). The assessment involved examination of a number of documents, including a self-assessment questionnaire, policies and codes. It also included examination of a supply chain chart specifying the origin of solar panels and their inputs such as solar cells and wafers, polysilicon and quartzite to confirm that these products and materials were not sourced from Xinjiang.

The 2nd tier supplier confirmed that it wasn't aware of any actual incidents of modern slavery cases occurring in its operations or supply chains, but we understand that does not mean there is no risk. We have included specific anti-modern slavery clauses in the 1st tier supplier agreement and will continue to monitor compliance with our requirements. We believe that this approach will help us minimise the risk of modern slavery, while fostering stronger relationships with our suppliers.

10. This standard was formerly known as ELEVATE Responsible Sourcing Assessment standard (ERSA). The company previously known as 'ELEVATE' was acquired by leading global assurance partner, LRQA, in April 2022.

RISK MANAGEMENT CONTINUED

Facilities management

Modern slavery risks also 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.

We outsource these services from our principal supplier, and work closely with them to manage these risks. 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 suppliers.

To confirm that there are no instances of noncompliance regarding the supply of labour, suppliers are required to acknowledge that they've met the following requirements (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 anti-modern slavery requirements in their contractual supplier agreements.
- Utilising leading industry pricing schedule and analytics to confirm that there is no underpayment 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 skilled roles at our corporate offices, warehouses, and retail partners' venues. From time to time, we procure 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

Whistleblower program

Consistent with our commitment to maintaining a culture of honesty and integrity, we have a Whistleblower Policy and framework in place to help us meet our legal and regulatory obligations and to assist anyone who wants to be, and is eligible to be, a whistleblower. The Policy 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. It 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.

The whistleblower program provides a source of continuous learning based on engagement and dialogue. These learnings help us improve our program and prevent future grievances and harms.

Our Whistleblower Committee received a total of 21 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.

Retail Workers Hotline

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 four reports during FY24 through our Retail Workers Hotline. The reports related to timeliness of receipt of wages, payment for overtime worked, payment of superannuation (two) and a query regarding shift allocations.

Upon investigation and confirmation of any follow up actions, it was confirmed the agents complied with requirements and the cases were subsequently closed.

REMEDATION

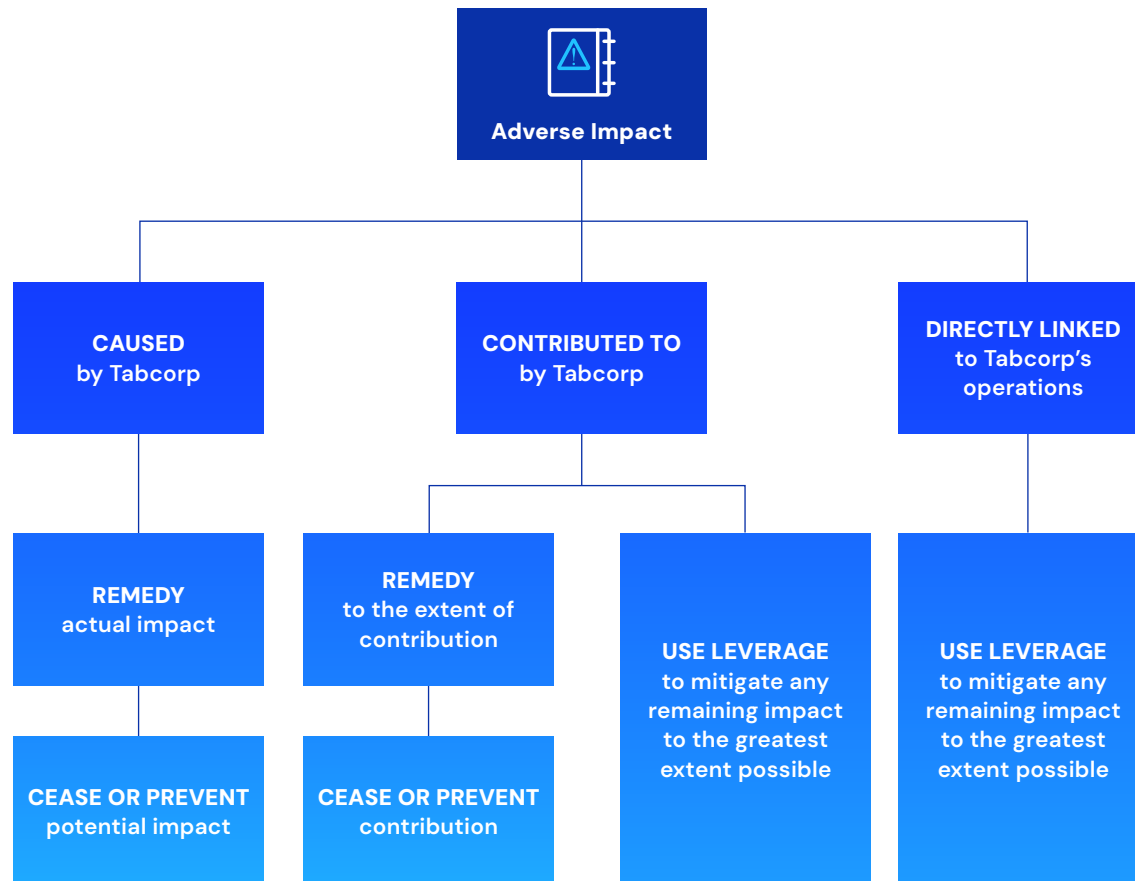
We work collaboratively with our suppliers to enhance their understanding and check compliance with our expectations regarding modern slavery and human rights standards.

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 have not identified any instances of modern slavery within our operations and our supply chain during FY24.

In the instance where modern slavery is identified, we will immediately take corrective actions. We use the following guidance from the United Nations Guiding Principles on Business and Human Rights when determining how to respond to potential or actual adverse impacts:



CAPABILITY BUILDING

We have an ongoing commitment to responsible procurement and human rights.

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

During FY24, we enhanced our capabilities as follows:

- Delivered 'Speak Up & Do What's Right' Essential Learning module to all 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.
- Engaged and collaborated with several stakeholders through various channels to address modern slavery, improve our knowledge and leverage best practice reporting, as outlined in the Stakeholder engagement section.
- Implemented a Source-to-Contract Roadmap to modernise and enhance our supplier management processes. A major element of this Roadmap is the uplift of our supplier due diligence capabilities, leveraging advanced technology to enhance our supplier risk assessment process.
- 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.
- Developed targeted training to our suppliers to improve their awareness and understanding of modern slavery risks, our compliance requirements, their obligations and our escalation process.

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	2 training programs delivered: <ul style="list-style-type: none"> • Scenarios based training for Procurement and Property teams • ‘Speak Up & Do What’s Right’ Essential Learning module to all team members across our business
Number of team members that completed training on modern slavery	All relevant team members across the business: 2,744 as at 30 June 2024. This represents a 97% completion rate. Current team members are required to complete training annually within 60 days from February. New starters have 30 days to complete it
Number of grievances raised with modern slavery indicators	0
Contracts that include modern slavery clauses	<ul style="list-style-type: none"> • Our template procurement agreements include modern slavery clauses. Where we negotiate an agreement based on supplier terms, we ask them to include appropriate coverage of modern slavery obligations • We conduct vendor governance meetings with strategic 1st tier 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	<ul style="list-style-type: none"> • Fair Work self-audit program: completed annual audit with 148 retail partners. 15 instances identified where further action was required. These related to agent knowledge/processes regarding superannuation payments; records management; employee entitlements (including allowances, reimbursements, deductions, break and leave provisions); employment of volunteers; provision of information statements to employees; and modern slavery reporting requirements. These have been addressed and closed out • Independent third party audits: completed social audits on three key suppliers. Minor non-conformances (three) related to policies and management systems were identified during the audits and have been addressed
Number of tenders including modern slavery risk as a key criteria in supplier selection and qualification	14
Number and value of contracts terminated by Tabcorp due to modern slavery	0
External ratings	Received a ‘A’ rating from Monash University for the quality of our FY23 Modern Slavery Statement, in their report released in November 2024

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

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 implementation of our Anti-Modern Slavery Strategy and Roadmap. Our key priorities are to:

- Deliver targeted training to our suppliers to improve their awareness and understanding of modern slavery risks, our compliance requirements, their obligations and our escalation process.
- Review our FY24 risk assessment and expand our audit program to include additional high risk suppliers.
- Explore opportunities to support survivors of modern slavery.
- Enhance our disclosures to align with emerging best practice reporting, such as the ISSB¹¹ Standards.

11. International Sustainability Standards Board

REPORTING ENTITIES

The following Tabcorp entities are considered reporting entities under the Act in respect of FY24 and are covered by this Statement.

Key brands	Reporting entity	ABN	Principal activity
Tabcorp	Tabcorp Holdings Limited	66 063 780 709	The ultimate holding company of the Group, which is publicly listed on the Australian Securities Exchange
	Tabcorp Assets Pty Ltd	73 064 303 920	The primary employing entity and contracting party for procuring goods and services for the Group
	Tabcorp Finance Pty Ltd	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
	Tabcorp Wagering (Vic) Pty Ltd	37 134 587 107	Operates wagering in Victoria
	Tabcorp Wagering Participant (Vic) Pty Ltd	59 154 418 489	Party to the joint venture that conducted the Victorian wagering business ¹²
	Tab Limited	17 081 765 308	Operates wagering in New South Wales
	UBET QLD Limited	84 085 691 738	Operates wagering in Queensland
	Tabcorp Maxgaming Holdings Limited	19 108 686 040	The holding company for gaming services and some wagering operations
	Maxgaming Holdings Pty Ltd	86 079 909 541	The intermediate holding company for gaming services operations
	Tabcorp International No. 4 Pty Ltd	41 146 788 614	The holding company for the Premier Gateway International business located in Isle of Man
	Sky Channel Pty Ltd	77 009 136 010	Operates television and radio broadcasting services
	Tabcorp International Pty Ltd	26 006 574 652	The holding company for the Group's non-Australian operations

CONSULTATION AND APPROVAL PROCESS

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

Our Company Secretary and Sustainability 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 the Group 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.

12. The joint venture operated under the previous Victorian Wagering and Betting Licence which expired on 15 August 2024.

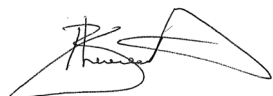
STATEMENT ANNEXURE

Principal governing body approval

This Statement was approved by the Board of Directors of Tabcorp Holdings Limited, being the principal governing body as defined by the Act, on behalf of all reporting entities specified in this Statement on 4 December 2024.

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.



Brett Chenoweth
Chairman

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	4-6
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	12-15
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	16-22
e. Describe how the reporting entity assesses the effectiveness of these actions	23
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)	24
g. Any other information that the reporting entity, or the entity giving the Statement, considers relevant	7-11

Forward-looking statements

This Statement 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.

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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.