



MODERN SLAVERY STATEMENT

2026

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Entain Australia - Modern Slavery Statement 2026

Entain Group Pty Ltd (hereafter 'Entain Australia') is pleased to submit its Modern Slavery Statement for the calendar year ended 31 December 2025, as required under the Australian Commonwealth Modern Slavery Act 2018 (the Act). We have prepared this statement on a consolidated basis for Entain Australia together with its related reporting entity, LB Australia Holdings Pty Ltd and parent company Entain plc. Entain plc's Modern Slavery Statement made under Section 54(1) of the UK Modern Slavery Act 2015 can be found here: <https://entaingroup.com/sustainability/modern-slavery-statement/>. This statement sets out Entain Australia's activities and measures taken between 1st January and 31st December 2025 to prevent modern slavery and human trafficking occurring within our own operations and extended supply chain.

About Entain

Entain plc is one of the world's largest sports-betting and gaming groups, operating exclusively in regulated and regulating online and retail betting and gaming markets. Listed on the FTSE 100 Index, the Group has a global presence with operations in over 30 markets. We employ a workforce of around 30,000 colleagues across Europe, the Americas and APAC.

With more than 35 leading brands, each tailored to the expectations of local customers, local markets and local regulators, we have a global presence and hold podium positions in the world's largest regulated markets. Across the Entain Group we own our proprietary technology across all of our core product verticals and in addition to B2C operations, we provide services to third-party customers on a B2B basis, such as licensing technology.

Entain's approach to preventing modern slavery and upholding human rights is embedded within our broader ethics, sustainability and risk management framework.

About Entain Australia

Within Australia, LB Australia Holdings Pty Ltd is the parent company of the Entain Australia group. Entain Australia operates the Ladbrokes and Neds wagering brands.

LB Australia Holdings Pty Ltd and Entain Australia are both required to report in accordance with section 5 of the Act.

Entain Australia's Structure Operations and Supply Chains

Entain Australia currently operates a process-driven, technology-based business with offices in Darwin, Sydney, Melbourne and Brisbane. We provide online wagering markets across a diverse range of Australian and international racing and sports events, operating two consumer wagering brands in Australia.

LB Australia Holdings Pty Ltd is the Australian parent company of Entain Australia. LB Australia Holdings Pty Ltd does not directly employ staff, transact with customers or engage suppliers, and falls under the same policies and procedures of Entain Australia.

The majority of our employees are skilled employees working across the main business areas of technology, marketing, corporate, operations, client services and trading. Our people are directly employed wherever possible and we maintain strict controls to ensure that both permanent and contracted staff have the legal right to work within Australia. Suitable references are received and identity confirmation checks are carried out for new employees. We minimise use of temporary labour in our offices wherever possible.

As our principal activities consist of online wagering, the majority of our suppliers consist of technology, marketing and media businesses. Any new supplier must agree to abide by our Modern Slavery Statement, our Code of Conduct and our Supplier Code of Conduct. In addition, suppliers are asked to declare if they have been subject to any form of regulatory or other investigations or enquiries involving matters related to possible bribery or corruption. This is a key step in bringing Modern Slavery to the forefront of our business processes. Like us, these businesses generally employ sizable, skilled workforces, which operate using digital technologies. We look to establish long term relationships with suppliers we trust in these areas and aim to have a low turnover of our supplier base.

Modern Slavery Risks in Our Business

We believe that our business and operating model carries intrinsically low risk in the area of Modern Slavery, however we recognise that people becoming enslaved is a key issue across the globe. We acknowledge that according to the International Labour Organisation, almost 27.6 million people are estimated to be trapped in forced labour; 17.3 million of whom are exploited in the private sector. We take this issue seriously and prohibit all forms of slavery, both in our own operations and within our extended supply chains.

Our approach to Modern Slavery is guided and reinforced by our Code of Conduct and associated policies. Our policies are informed by our commitment to respect internationally recognised human rights. In recognition of the evolving legislative landscape, including developments in modern slavery and employment law, our policies are subject to regular review and updating. As part of our policy governance framework, policies are reviewed formally at least every two years, or more frequently where required, for example due to legislative or operational changes.

Policies that are relevant to Modern Slavery

i. Our Code of Conduct

Our approach to Modern Slavery is supported by the Entain Code of Conduct. We aim to meet the highest standards in everything we do, from the way we run our business and manage our financial affairs, to how we support our people, customers and communities. We take our legal and ethical responsibilities very seriously as well as our duty to act honestly, openly and with integrity. We recognise that our commitment to the prevention of modern slavery goes beyond a legal duty.

Our Code of Conduct forms the backbone of our expectation for all people (employees and contractors) who work for, or with, Entain. It is a summary of the standards, policies and principles of fair play, honesty and integrity that underpin Entain and is based upon our corporate values. It is reviewed annually and was last updated in April 2026. Each new version of the Code of Conduct is approved by the Group ESG Committee.

The 2026 Code of Conduct included a statement from our CEO, Stella David, emphasising Entain's commitment to upholding the highest standards in everything we do. It explicitly set out Entain's commitment to preventing Modern Slavery and that we expect the same commitment from our employees and business partners.

ii. Global Modern Slavery & Human Rights Policy

In May 2026, Group reviewed and updated our Modern Slavery & Human Rights Policy, which sets out our commitment to preventing Modern Slavery. The Policy forms part of our educational efforts for employees and includes a description of Modern Slavery, warning signs to look out for, our expectations of all employees, including the requirement to not use forced or compulsory labour, comply with all applicable employment standards, take reasonable steps to ensure suppliers adhere to these requirements and raise any suspicions using our established Speak Out (Whistleblowing) process.

iii. Global Anti-bribery & Corruption Policy

The Global Anti-Bribery & Corruption Policy sets out the standards of behaviour Entain expects to ensure the integrity of our supply chains and reduce the risk of bribery and corruption across our business. Bribery and corrupt behaviour can often be closely associated with other illegal behaviour, such as Modern Slavery, and so this Policy helps to mitigate any associated Modern Slavery risks. The Policy highlights red flags (many of which can also be potential indicators of Modern Slavery), such as improper business practices, cash payments; non-standard or customised invoices; or special relationships with government officials. The Policy is reviewed annually and approved by the Audit Committee. It was last updated in April 2026.

iv. Global Procurement Policy

The objective of the Procurement Policy is to offer an efficient, informative and standardised approach to how the Group manages suppliers across the procurement lifecycle - from how we

seek out new suppliers to tendering, selecting, contracting and managing the associated third-party risk(s) through to exit. The Policy ensures common minimum standards are applied through the lifecycle of an agreement with a supplier, as suppliers are required to adhere to our key policies, including the Supplier Code of Conduct (see below) and the Entain Code of Conduct. The Policy specifies that appropriate due diligence and risk management is conducted, amongst other requirements. The Policy is reviewed annually and was last updated in April 2026.

Failure to pay supplier invoices on time can lead to increased pressure on suppliers leading to a higher risk of modern slavery in our supplier chains. We therefore strive to ensure the timely payment of suppliers in line with the terms of the Procurement Policy.

v. Global No PO, No Pay Policy

We operate a No PO (Purchase Order), No Pay Policy that is referenced in our Procurement Policy and widely communicated across the Group. This ensures all suppliers are vetted, which ensures that the right due diligence is being undertaken to mitigate, amongst other things, risks related to Modern Slavery. The Policy is reviewed annually and was last updated in June 2025.

vi. Global Supplier Code of Conduct

The Supplier Code of Conduct sets out the social, ethical and environmental standards that Entain expects from everyone who does business with us as a supplier or business partner anywhere in the world. Any new supplier must read and agree to the Supplier Code of Conduct prior to their onboarding with Entain. It includes the 10 guiding principles set out in the Entain Code of Conduct and requires suppliers to comply with all applicable laws, regulations and codes of practice, including human rights and employment laws. Any potential breaches must be notified to Entain promptly and suppliers are able to use a confidential whistleblowing email address to raise concerns.

The Code sets out the minimum labour standards Entain expects from all our suppliers.

It explicitly states that suppliers must:

1. not use child labour either directly or in their supply chain and ensure they have adequate procedures and measures in place to prevent this;
2. not use forced labour;
3. ensure workers have the freedom to terminate their employment contract without unlawful penalty;
4. pay their workers at least the legal national minimum wage and provide workers with clear payroll statements;
5. provide benefits to workers that meet legal minimum standards and not unfairly deduct any benefits from their wages;
6. ensure workers do not exceed the maximum number of hours worked as set by local law;
7. not unreasonably restrict workers' freedom of movement;
8. value diversity and protect the health, safety and wellbeing of their workers; and
9. respect the rights of workers to exercise free association.

The Supplier Code of Conduct is reviewed annually and was last updated in April 2026.

vii. Global Speak Out Policy (Whistleblowing)

The Speak Out Policy encourages people to speak out about any behaviour that might be illegal, unethical or that breaches our Code of Conduct. The Policy specifically lists Modern Slavery issues (including paying fees to obtain jobs at Entain, poor labour practices or poor working conditions) as an example of the sort of issues that can be reported. It confirms that reports can be made in relation to third-party suppliers.

Concerns can be raised to a line manager or HR, Entain's secure, confidential mailbox or our independent Speak Out hotline (which is also available to suppliers and is included in the Supplier Code of Conduct). Reports can be made to the hotline confidentially (and anonymously if desired) 24 hours a day, seven days a week.

The Speak Out Policy is reviewed and approved by the Audit Committee. It was last updated in March 2026.

Accessing and communicating Entain policies

Communicating Our Code and policies to new employees forms part of our onboarding programme. Our Code and key policies are also supported by a robust and effective annual training programme, which includes modern slavery. As part of this mandatory training, employees have to confirm that they will follow the principles set out in Our Code. New employees receive this training as part of their induction programme.

Our policies are available through the Entain Australia intranet platform which all Australian employees have access to. New and updated policies are supported by Group-wide communications across a variety of channels, including targeted communications to senior leaders, the intranet and email to raise awareness. Our Ethics Champions League, made up of representatives from across the Group, disseminate ethics and compliance messages, including new or updated policies, at the local level. Entain takes breaches of our Code, policies, and procedures very seriously and investigates allegations as appropriate. Substantiated allegations may result in disciplinary action up to dismissal.

Where our suppliers or business partners are alleged to have breached our Supplier Code of Conduct or associated contractual obligations, those allegations will be investigated to determine the appropriate course of action. We will always try to resolve issues related to modern slavery collaboratively in the first instance, but where this is not possible, contracts may be terminated and business activity with those third parties ceased. No reports of alleged breaches of the Supplier Code of Conduct around modern slavery were received during 2025.

We recognise that suppliers who have failed to meet our required standards relating to modern slavery will often have done so by mistake or due to extenuating circumstances, so we make every effort to work with them to resolve issues and ensure a safe environment for suppliers and their workers to speak up about any concerns.

Training

Modern slavery training is included as part of the annual mandatory 'Big4' eLearning training programme, which also covers other ethics and compliance related topics, such as safer gambling, data privacy and bribery. The Big4 is updated every year and in 2025, we refreshed our training strategy to ensure that all Entain colleagues have a common baseline of knowledge that is critical to our operations, with a focus on real-life examples.

Every colleague, unless a justified exception applies, must complete all four modules of the Big4 training. For colleagues eligible to participate in the Group bonus plan, bonus payments can be reduced to zero if all four modules are not completed

Recruitment and onboarding of staff

We aim to attract a diverse workforce of people who are passionate about what they do, reflect our values, and want to do their best. We recruit, promote and reward people on merit. We recognise that discrimination is both illegal and unethical and can act as an enabler of exploitation. Accordingly, we recruit, promote and reward people on merit. Our Global Equality, Diversity and Inclusion Policy sets out our commitment not to discriminate on the basis of a person's age, disability, gender or gender reassignment, pregnancy or maternity, race, religion or belief, sexual orientation or marriage/civil partnership.

We always operate in a legal and ethical manner with our recruitment practices and ensure an individual's legal right to work within the given country is checked; appropriate references are received; and suitable identity documentation is available to the candidate (i.e., they have access to their passport or other similar legal document in their name and it is not held by anyone other than the employee). For some roles (e.g. senior or specialist roles), identity confirmation checks are also carried out.

We recognise and comply with a number of the indices within the Responsible Recruitment Toolkit including:

- we have a business structure, business model and governance compatible with operating legally, ethically and sustainably;
- we do not use child labour or forced or compulsory labour, and opportunity and treatment is fair and equal, as set out in our policies;
- legal eligibility to work is established;
- ethical standards of recruitment and labour supply are embedded through an effective applicant tracking system, which ensures recruitment is transparent, personal data is protected and application of procedures are consistent and controlled; and
- a worker-centred approach is taken to ensure high levels of worker job satisfaction and engagement – candidates applying for jobs with the Group are regularly asked for feedback on the recruitment process, which in turn informs continuous improvement efforts

Actions Taken by Entain to Assess and Address Modern Slavery Risks

In addition to our publicly available Supplier Policy, our internal processes, procedures and policies help us identify risk. Our Contracts Policy requires business owners to engage in due diligence in relation to potential suppliers. Such due diligence includes conducting initial risk assessments, various background searches and escalating any adverse findings to Senior Leaders. Where applicable, based on risk, size and strategic alignment, we enter into a commercial and contractual relationship ensuring we have an agreed set of terms and conditions setting out how we wish to trade, pricing, delivery timelines, data protection, security compliance, ethical standards and behaviours in accordance with relevant laws and jurisdictions.

i. The Procurement Lifecycle

Our procurement function has implemented a common set of processes, tools and policies that govern the way we source, review, assess and engage with our suppliers:

- We ensure we clearly capture the needs of the business
- We competitively tender such need
- We evaluate, clarify and negotiate
- We contract manage
- We exit and service transfer when such relationships come to an end

Throughout our processes we have the appropriate review mechanisms to highlight and manage risk in relation to delivery of products or services, data protection, security compliance, technical compliance and our CSR standards.

Regular communication and interactions with our suppliers are key in ensuring, where applicable, we see and evidence the working environment and practices they trade within.

ii. Monitoring and Assessment

The Entain Code of Conduct, Modern Slavery Policy, Contracts Policy and related training materials clearly set out our expectations: that all employees and suppliers act in a proactive, legal and ethical manner at all times.

Entain Australia endeavours to maintain proactive relationships with its suppliers and continually assesses their performance and

corporate standing. In 2021, we updated our supplier audit processes and standard contracting terms to include human rights and Modern Slavery items and will continue to implement further measures to drive visibility within our supply chain. We also endeavour to renew and update our Modern Slavery training materials each year and will continue to audit employee compliance in relation to mandatory trainings.

Entain Australia regularly consults Entain plc in relation to our governance practices, including our compliance with Modern Slavery laws and we will strive to frequently consult with them in relation to our monitoring and assessment of such practices.

The effectiveness of the steps Entain has taken in relation to Modern Slavery is assessed through testing knowledge of staff in relation to Modern Slavery through annual training modules, and compliance with other relevant policies including the Contracts Policy. Any failure to reach required thresholds of knowledge and any non-compliance with relevant policies will lead to further training and direction for the staff member involved. Effectiveness is also assessed by regular assessment of employee and contractor processes and quality assurance of contracting processes.



iii. Governance

In 2024 the Group established its Modern Slavery Strategy 2024 – 26. The Modern Slavery Strategy sets out what we wish to achieve by the end of 2026 and how we will achieve our goal of preventing Modern Slavery within our business and supply chains. It has been approved by the Entain Board's Sustainability & Compliance Committee, as part of our commitment to adhering to the highest standards of corporate governance and oversight.

The Modern Slavery Strategy identifies three priority issues based on an analysis of Entain's biggest risks and impact:

- recruitment;
- third party risk management; and
- transparency and reporting.

This Strategy aims to address these three areas of focus. The strategy is reviewed at the end of each year, to ensure it remains the best approach to achieving our vision, with a full review to be carried out by the Group Ethics & Compliance function in 2026.

Modern Slavery risks, the legal and regulatory framework in which we operate, best practice and the expectations of our wider stakeholders continually evolve, which means there are always improvements that can be made. Modern Slavery will continue to form an ongoing part of the audit cycle of the Group to ensure that the controls continue to work effectively and are assessed for opportunities to improve regularly.

This statement was approved by the boards of each of the reporting entities covered by this statement on 5 June 2026 and will be reviewed annually.



Andrew Vouris

CEO and Director, Entain Group Pty Ltd
Director, LB Australia Holdings Pty Ltd.



Samuel Moncur

CFO and Director, Entain Group Pty Ltd
Director, LB Australia Holdings Pty Ltd.