



MODERN SLAVERY STATEMENT

Introduction

This is the first Modern Slavery Statement made by PointsBet Holdings Limited (**PointsBet Holdings**) under the *Modern Slavery Act 2018 (Cth)* (the **Act**).

This Modern Slavery Statement covers the activities of PointsBet Holdings and the consolidated entity comprising PointsBet Holdings and its subsidiaries (**PointsBet**). This Statement outlines PointsBet's responsibilities in identifying and mitigating the potential risks of modern slavery, in all its forms, within its business operations and supply chains.

The wagering industry is highly regulated and PointsBet puts legal and regulatory compliance at the centre of its operations. PointsBet has a zero-tolerance approach to any form of modern slavery and is committed to the highest levels of integrity and ethical standards in all its business practices.

About PointsBet

Structure

PointsBet is an online corporate bookmaker that has developed a scalable cloud-based wagering platform through which it offers its clients innovative sports and racing wagering products.

PointsBet Holdings is incorporated in Australia and is listed on the Australian Securities Exchange. PointsBet Holdings wholly owns and controls 30 subsidiary entities, which undertake operational and management activities of PointsBet. All of these entities are incorporated in either Australia, the United States, Canada or Ireland.

Operations

PointsBet operates in Australia, the United States, Canada and Ireland and employs approximately 490 people, all of whom are over 18 years of age. PointsBet seeks to employ its own staff directly where possible which reduces the number of suppliers in its supply chain and enables PointsBet to train staff in its processes and policies in respect of anti-bribery and corruption, whistleblowing and now, modern slavery.

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Supply chains

In order to advance its operations, PointsBet generally procures the following goods and services (in descending order of total spend percentage as calculated at FY21 year-end):

Marketing and branding	44.40%
Cost of sales	27.83%
People and performance	13.41%
Information and communication technology (includes hardware and software used to develop and manage systems and capitalised software)	10.36%
Professional services and insurance	1.38%
Corporate costs	2.17%
Utilities, rates and rent	0.28%
Travel and entertainment	0.18%

PointsBet's business is highly technical, focusing on the provision of online services rather than tangible products. As demonstrated above, most of PointsBet's procurement spend is in highly skilled sectors such as information technology, marketing and professional services.

The vast majority of PointsBet's suppliers are located in Australia, the United States, Canada and Ireland, all of which are deemed as low risk for modern slavery according to the *Global Slavery Index 2018*. However, PointsBet does procure some outsourced customer service and technology resource services directly from overseas suppliers in the Philippines and India. PointsBet has written contracts in place with these service providers which cover relevant obligations as they relate to data protection, privacy and fair and equitable treatment of contractors.

PointsBet's approach to procurement and contractual relations with third parties has always been to work with reputable and ethical industry leading organisations that are equally committed to preventing modern slavery in all areas of business. In order to limit PointsBet's exposure to modern slavery risks in its supply chain, PointsBet seeks to source goods and services from local suppliers within the same jurisdiction as the relevant PointsBet subsidiary.

In the medium term, PointsBet is focused on developing a supply chain map that illustrates the particular goods and/or services being procured, the geographic location of the products and services, and which highlights the risks of modern slavery in connection with those locations.

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Modern Slavery Risks in PointsBet's Supply Chains and Operations

Due to the nature of its operations, PointsBet has a limited supply chain. Information Technology is assessed as a higher-risk category for PointsBet due to the highly dispersed and global nature of supply chains and because it is PointsBet's largest category of expenditure. However, PointsBet sources Information Technology predominantly through Australian, United States, Canadian and/or Irish based suppliers and, as such, PointsBet considers that the risks of modern slavery practices in its supply chains are low.

Nonetheless, PointsBet is aware that modern slavery could occur in PointsBet's extended supply network. PointsBet will remain vigilant and continue to assess its supply chains to identify suppliers in higher risk categories and will seek to ensure suppliers are meeting or exceeding modern slavery and human rights standards and requirements.

If PointsBet's risk assessment changes, additional actions, policies and procedures will be implemented accordingly.

Policies and governance

PointsBet has a range of corporate governance policies that assist in ensuring there is no modern slavery in its operations and supply chain, and that PointsBet's reputation and ethical practices are maintained.

PointsBet's Code of Conduct provides a benchmark for professional behaviour expected from all employees, and applies to all business activities with suppliers, contractors, customers, shareholders and employees in Australia and overseas. The Code of Conduct outlines that it is each employee's responsibility to act at all times ethically and responsibly and encourages employees to report any fraudulent, unethical or irresponsible behaviour. PointsBet ensures regular training on the Code of Conduct for employees.

PointsBet's Whistleblower Policy provides a framework for employees and suppliers of goods or services to PointsBet to anonymously report instances of suspected or actual misconduct without fear of intimidation, disadvantage or reprisal. PointsBet will investigate all reports of misconduct and take appropriate action.

Both the Code of Conduct and the Whistleblower Policy are supported by PointsBet's Anti-Bribery and Corruption Policy. PointsBet will educate employees on the Act, communicate this Statement and ensure all employees understand the risks of modern slavery in PointsBet's operations and supply chain and the importance of reporting identified risks.

Management of risks and mitigation strategy

When engaging with material suppliers, PointsBet conducts due diligence and risk assessments, including, where relevant, review of their cyber security and data protection systems and compliance with relevant KYC and AML obligations.

In order to mitigate the risk of modern slavery within its supply chain, PointsBet endeavours to include provisions to ensure third party compliance with applicable laws and regulations in all contracts.

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PointsBet will continuously assess suppliers in its supply chain to understand potential high risk areas in relation to modern slavery and is currently implementing a new supplier questionnaire into its procurement process to assist in understanding and mitigating risks of modern slavery occurring in PointsBet's supply chain.

In the event that PointsBet identifies a modern slavery risk in its engagement with a supplier, PointsBet will further investigate the issue and collaborate with the supplier in order to determine whether or not the issue is resolvable. Where the presence of slavery is confirmed in a supplier's operations or the issue is not otherwise resolvable, PointsBet will seek to terminate its contractual and other commercial relationships with that supplier as soon as is possible.

From an employer perspective, PointsBet has a range of employee processes in place and conducts background and verification checks on all key employees and contractors. PointsBet employees also undergo a comprehensive induction programme and training and have access to PointsBet's wide range of guidance and policies.

Future commitments

Going forward, PointsBet will progress the following strategies:

- monitoring changes in supply chains or operations to ensure new or evolving risks are identified and addressed appropriately and proportionately;
- regularly reviewing policies and procedures to ensure they remain effective in combatting all forms of modern slavery;
- seeking to include clauses in supplier contracts to ensure compliance with applicable laws, including the Act;
- developing a Supplier Code of Conduct; and
- increase auditing of external third-party suppliers.

This Modern Slavery Statement was approved by the Board of PointsBet Holdings Limited on 23 September 2021.



Signed by Brett Paton

Chairman of the Board

PointsBet Holdings Limited