



Entain Australia
**Modern Slavery
Statement 2021**

Entain



Entain Australia - Modern Slavery Statement 2021

Entain Group Pty Ltd (hereafter 'Entain Australia') is pleased to submit its Modern Slavery Statement for the calendar year ended 31 December 2020, 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 2020 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 in the digital and retail sectors. Incorporated in the Isle of Man, we hold licences in over 20 jurisdictions and employ more than 24,000 staff in 20 locations, across five continents.

We are proud to own a comprehensive portfolio of established betting and gaming brands including; bwin, Coral, Crystalbet, Eurobet, Ladbrokes, Neds, Sportingbet, CasinoClub, Foxy Bingo, Gala, Gioco Digitale, partypoker and PartyCasino. In the US, we own and service BetMGM, our joint venture with MGM Resorts International.

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.

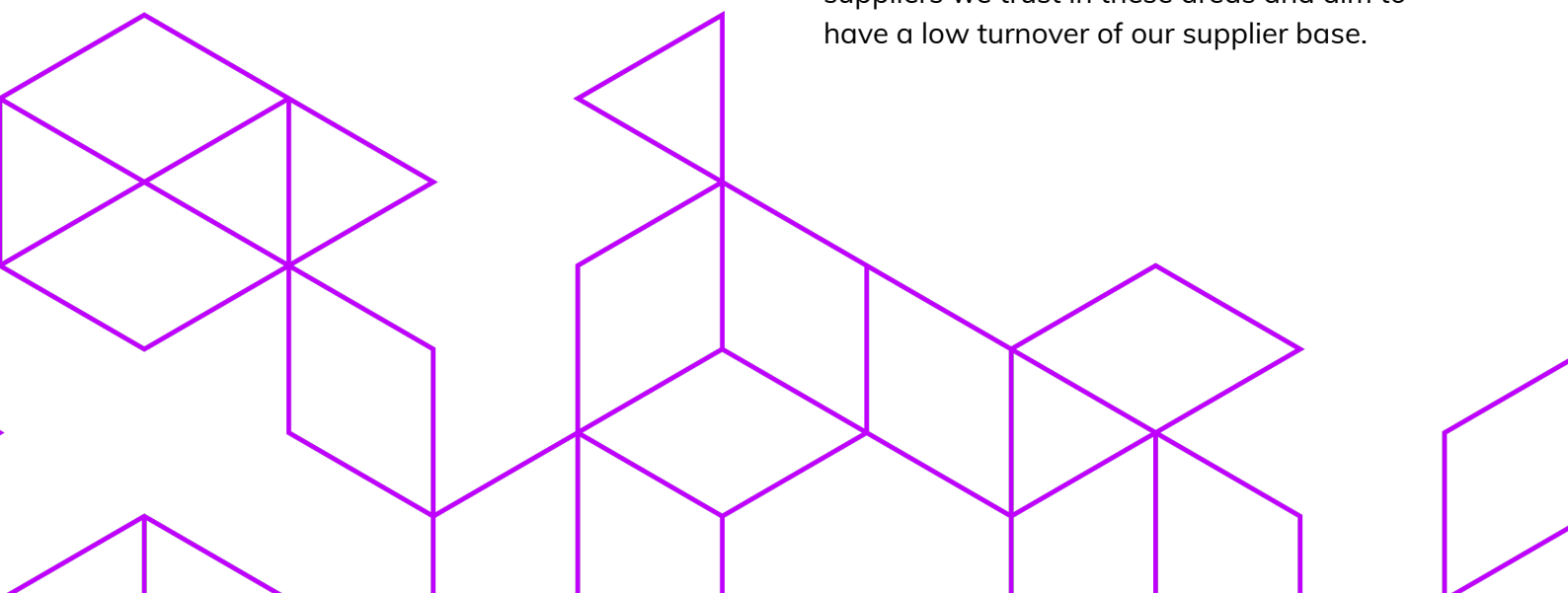
Within Australia, LB Australia Holdings Pty Ltd is the parent company of the group, while Entain Australia operates the Ladbrokes, Neds, Bookmaker.com.au and Betstar brands. LB Australia Holdings Pty Ltd and Entain Australia are both required to report in accordance with section 5 of the Act.

Entain Australia's Structure Operations and Supply Chains

Entain Australia currently operates a process-driven, technology-based business across four consumer wagering brands, with offices in Darwin, Sydney and Brisbane. We provide online wagering markets across a diverse range of Australian and international racing and sports events. 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. 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. 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. According to the International Labour Organisation, almost 25 million people are estimated to be trapped in forced labour; 16 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 is guided and reinforced by our Code of Conduct which applies to all of our Global Group employees.

Our 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.

Our Code of Conduct sets out 10 guiding principles that we expect all our colleagues, suppliers and partners to adhere to:

- 1 We take all allegations of malpractice and misconduct seriously and will deal with individuals' concerns confidentially and sensitively.
- 2 We do our best to resolve all work-related issues fairly and quickly.
- 3 We are committed to helping our customers gamble responsibly.
- 4 We abide by the highest standards of financial conduct and will never tolerate bribery, money laundering, conflicts of interest, tipping off, anti-competitive practices or unauthorised share dealing.
- 5 We don't discriminate on the basis of age, disability, gender or gender reassignment, pregnancy or maternity, race, religion or belief, sexual orientation or marriage / civil partnership.
- 6 We promote equality, diversity and inclusion in all our working practices.
- 7 We act with tolerance and empathy. There is no place in our company for bullying, harassment, victimisation, violence, threats of violence or abuse of any kind.
- 8 We are committed to providing a safe working environment that promotes our people's safety, health and wellbeing.
- 9 We make every effort to protect personal information relating to our employees, customers and suppliers.
- 10 We work hard to reduce our environmental impact as a business and make it as easy as we can for our colleagues to do the same.

Training

As well as being part of Entain's core Code of Conduct, we have in place a standalone Modern Slavery Policy, available on our intranet sites and covering all Global Group employees.

This policy sets out the importance of the issue, provides a clear definition of how to recognise Modern Slavery, employee obligations in respect of anti-slavery and the process to report any suspicious behaviours.

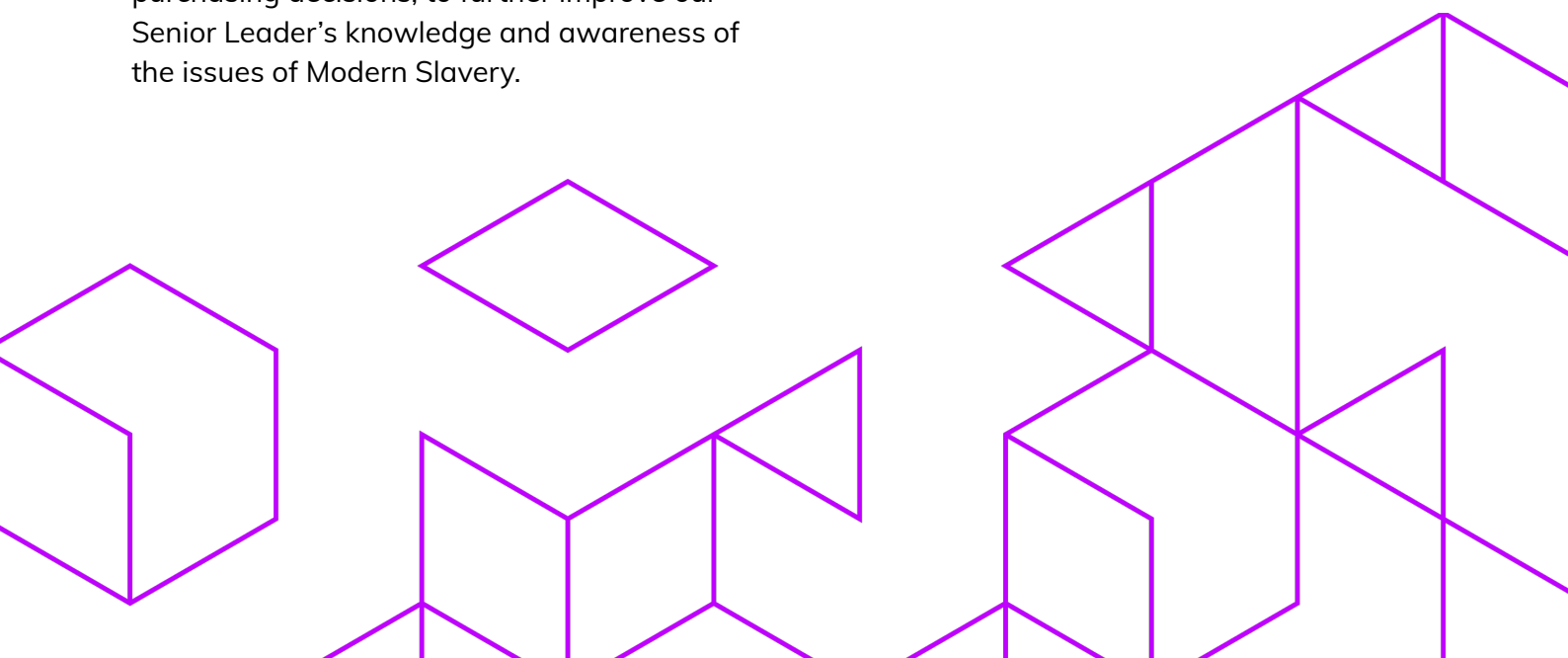
All our people are asked to complete our Code of Conduct training which includes sections on Modern Slavery. This module raises awareness of this important issue and covers how colleagues can confidentially raise concerns through our whistleblowing process or the usual grievance routes. Colleagues are reminded that they are fully supported to raise legitimate concerns and will never be penalised for reporting something which they genuinely believe to be wrong.

We have also provided a dedicated Modern Slavery module in our company wide training newsletter, which is provided to all Entain Australia staff. In 2021, we are in the process of implementing an additional mandatory Modern Slavery training session for all members of our Australian Senior Leadership Team and those employees making purchasing decisions, to further improve our Senior Leader's knowledge and awareness of the issues of Modern Slavery.

Our Anti-Slavery Obligations

All ENTAIN colleagues, particularly those responsible for recruitment, together with anybody working for us, providing services to us or working on our behalf across ENTAIN's global operations, must:

- Not use forced or compulsory labour, i.e. any work or service that a worker performs involuntarily or under threat of penalty;
- Comply with the minimum age requirements prescribed by applicable laws;
- Compensate workers with wages and benefits that meet or exceed the legally required minimum for that country;
- Abide by applicable laws concerning the maximum hours of daily labour;
- Take reasonable steps to ensure that any sub-contractors or suppliers from whom they source goods and/or services for ultimate use by ENTAIN adhere to these requirements; and
- Bring any actual or potential cases of Modern Slavery to the attention of ENTAIN's global HR Director immediately for further investigation using our Speak Out (Whistleblowing) procedure.



Actions Taken by Entain to Assess and Address Modern Slavery Risks

Entain plc implemented a common set of policies and procedures in 2019 in relation to procurement engagement guidelines, fair treatment of suppliers and risk management.

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.

Internal Policies

We have a number of Global and local policies relevant to our monitoring and assessment of Modern Slavery risks. These policies include:

- Modern Slavery Policy
- Code of Conduct
- Speak Out Policy
- Contracts Policy
- Anti-Bribery and Corruption Policy
- Grievance Policy

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.

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 are in the process of updating our supplier audit processes to include human rights and Modern Slavery items. We will also endeavour to renew and update our Modern Slavery training materials and 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.

Modern Slavery features within our Global Corporate Risk Register and as such is reviewed regularly by the Global Group Risk Committee. At Entain plc Board level, the CSR committee provide oversight to ensure that the Global Group is following its stated aims in this regard.

This statement was approved by the board of Entain Group Pty Ltd on 17 June 2021. The board of Entain Group Pty Ltd approved this statement on behalf of Entain Group Pty Ltd and the second reporting entity covered by the statement, LB Australia Holdings Pty Ltd. The board of LB Australia Holdings Pty Ltd did not approve this statement because LB Australia Holdings Pty Ltd is a holding company which does not have any outward facing operations or undertake external procurement. All procurement for LB Australia Holdings Pty Ltd is undertaken through Entain Group Pty Ltd, as detailed further on page 3 of this statement.



Dean Shannon

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



Lachlan Fitt

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