

The Lottery Corporation Modern Slavery Statement

2024





Acknowledgement of Country

The Lottery Corporation would like to acknowledge the First Nations Peoples of Australia. We acknowledge that they are the Traditional Custodians of the lands on which our offices, retail outlets and venues operate. As our nation and organisation continues our journey towards reconciliation, it is with great respect we acknowledge all Elders past and present. We acknowledge the inextricable link First Peoples of Australia, past, present and future, have with the land.

Artist Acknowledgement

Johanna Gregory, Stars Foundation past student.

“The River is what is generous for us as people. We are fortunate to be blessed with fresh and saltwater ecosystems. People tending to the land must give back what we take.”

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A Message from the Managing Director & CEO



At The Lottery Corporation, our purpose is to create positive impacts. In line with this purpose, we seek to operate ethical, sustainable and socially responsible procurement practices.

Whilst 90% of our supplier expenditure in FY24 was with Australian companies and the remaining 10% involved offshore suppliers from countries identified as low risk for modern slavery, we acknowledge our responsibility in identifying and addressing modern slavery risks.

Throughout FY24, we continued to strengthen and refine our business processes to identify and guard against modern slavery in our business.

We continued to evolve our risk assessments and due diligence processes by strengthening our supplier pre-qualification practices and expanding the deployment of our modern slavery risk assessment tool.

We uplifted and expanded our mandatory modern slavery training module for all employees, so team members are equipped to identify potential modern slavery risks.

To help mitigate issues arising in our network of retail partners we also surveyed our lotteries retailers to validate that appropriate employee conditions are in place.

We understand the importance of maintaining integrity and transparency across our supply chain, particularly in identifying risks that may arise further down the line. To help raise awareness of human rights issues among our suppliers, we developed a Supplier Toolkit. This resource is aimed at educating our suppliers and encouraging them to take proactive steps in upholding ethical standards and protecting human rights.

We have made progress in maturing our processes relating to modern slavery risk identification and intend to build on these foundations by continually evolving our approach and supporting fair and ethical supply chains.

A handwritten signature in black ink, reading "Sue van der Merwe". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Sue van der Merwe
Managing Director and Chief Executive Officer

5 December 2024

About this Statement

Reporting Scope

This Modern Slavery Statement covers the financial year 1 July 2023 to 30 June 2024 for The Lottery Corporation Limited and its subsidiaries (together, the Group), unless otherwise stated.

In this Modern Slavery Statement, the terms 'The Lottery Corporation', 'the Group', 'our business', 'the Company', 'organisation', 'we', 'us', 'our' and 'ourselves' refer to the Lottery Corporation Limited and its subsidiaries.

Reporting Entities

The Lottery Corporation and each of its wholly owned subsidiaries operate as one corporate group with central management and control functions. This statement is a joint statement covering the following entities which are each considered reporting entities for the purposes of the Modern Slavery Act 2018 (Cth):

- The Lottery Corporation Limited (ABN: 21 081 925 706)
- Keno (QLD) Pty Ltd (ABN: 89 071 366 446)
- Tattersalls Sweeps Pty Ltd (ABN: 99 081 925 662)
- New South Wales Lotteries Corporation Pty Ltd (ABN: 27 410 374 474)
- Golden Casket Lottery Corporation Limited (ABN: 27 078 785 449)
- Tatts Lotteries SA Pty Ltd (ABN: 41 146 245 007)
- L & K Operations Pty Ltd (ABN: 67 654 297 471)
- Tatts Keno Holdings Pty Ltd (ABN: 48 654 297 828)

Reporting Approach

This Modern Slavery Statement has been published in accordance with the Modern Slavery Act 2018 (Cth). It identifies the steps The Lottery Corporation (including the reporting entities listed above) took to identify, assess, mitigate and remediate modern slavery risks in its operations and supply chain.

Consultation and approval process:

This Modern Slavery Statement has been approved by the Board and by the Boards of all relevant reporting entities. This Modern Slavery Statement has been prepared in consultation with relevant members of management of the Group.

Important notice

This Statement contains a number of 'forward-looking statements' regarding The Lottery Corporation's intent, belief, targets, objectives, initiatives, commitment and/or current expectations with respect to the Group's business and operations.

While this information has been prepared by The Lottery Corporation in good faith, The Lottery Corporation does not provide any assurance that the relevant forward-looking information will prove to be correct. The forward-looking information contained in this Statement is subject to known and unknown risks and uncertainties and, in many cases, is subject to important factors outside the control of The Lottery Corporation.

This Statement should be read in conjunction with The Lottery Corporation's other periodic and continuous disclosure announcements lodged with the Australian Securities Exchange, including The Lottery Corporation's 2024 Annual Report and 2024 Sustainability Report.

Our Group Structure, Operations and Supply Chains

Who we are

The Lottery Corporation is the driving force behind Australia's leading lottery and Keno games and one of the best-performing lottery businesses in the world¹.

We operate a diversified and balanced portfolio of high-profile brands under exclusive and/or long-dated licences and approvals.

Customer-led convenience is central to our unique omni-channel offering. We bring Australia's largest lottery games to an estimated 10 million active lotteries customers².

We operate through more than 7,200 retail points of distribution, points which are integrated with our well-developed digital channel across web and mobile.

We have a proud history of delivering life-changing wins to our customers and making a meaningful difference in our communities.

The Lottery Corporation's business segments consist of:

Lotteries - The Company holds exclusive and/or long-dated licences or approvals to operate in all Australian states and territories (excluding Western Australia), with a significant retail distribution network and a strong online presence. The Lottery Corporation operates one of the highest performing lotteries businesses globally.

Keno - The Company is also licensed to provide Keno products to venues across New South Wales, Victoria, Queensland, South Australia and the Australian Capital Territory. Keno is supplied in licensed venues including hotels, clubs, casinos and TABs as well as online in the Australian Capital Territory and Victoria. Keno is also distributed through lottery outlets in South Australia.

1. The Lottery Corporation has the third highest draw lottery game sales per capita. Source: La Fleur's Almanac 2024 (Lotto and spiel).

2. Active customer numbers based on Roy Morgan Gambling Monitor, April 2023 – March 2024. Based on percentage of respondents who had purchased a lottery product over the last 12 months in The Lottery Corporation's jurisdictions of operations (ex. WA), and weighted against the Australian adult population as at March 2024, based on Australian Bureau of Statistics monthly estimates.

3. As at 30 June 2024. Comprised of 3,858 Lotteries outlets and 3,354 Keno venues.



SA



QLD



NSW, ACT

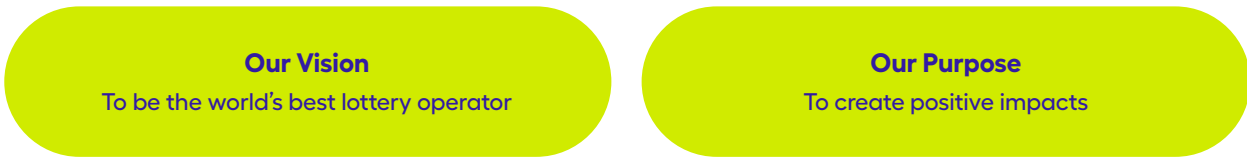


VIC, TAS, NT



Strategy

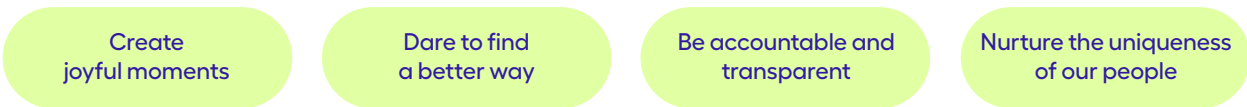
The Lottery Corporation maintains its ethos of being a socially responsible lottery operator, a facilitator of life-changing events, a workplace of choice and an integral part of the Australian identity. Our strategy continues to deliver.



Our vision and purpose form the forward-looking compass of our organisation. We continue to forge a path to lead our industry and become the world's best lottery operator while creating positive impacts for customers, shareholders and our community.

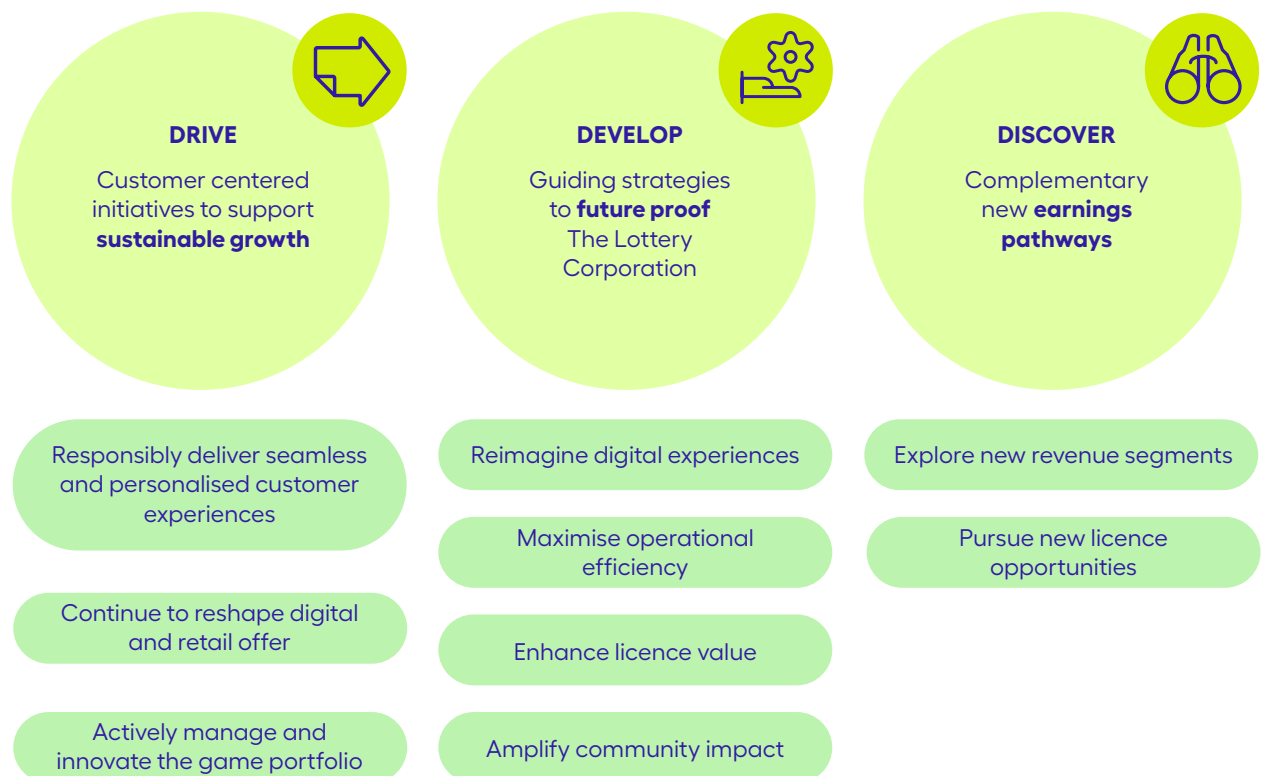
Our Principles

Underpinning our strategy are our corporate principles which guide how we do things and form the basis of our culture. We challenge our people to apply these principles to their day-to-day work life.



Strategic Priorities

Our strategic priorities form our long-term focus. For each of our three strategic pillars, 'drive', 'develop' and 'discover', we organise ourselves to explore and deliver on our vision in a focussed way. We regularly review and evolve these priorities to address market changes as well as the expectations from the communities we operate in.



At The Lottery Corporation, we uphold the principles of accountability and transparency in all our operations. We extend these principles to our relationships with third-party vendors, highlighting our shared responsibility to manage and mitigate modern slavery risks.

Our Sustainability Strategy

Creating social and community impact has always been one of our core objectives, from the early origins of our lotteries business to our business activities today. We seek to amplify our positive impact on our customers, our people and the communities we operate in.

Our sustainability strategy recognises the connection between sustainability and the well-being of people in the supply chain. It sets out our ambitions for positive impact across four pillars.



Operating our Business and Products Responsibly

We operate our business ethically and responsibly, helping customers to have fun while recognising our responsibility to help protect them from potential and actual harms that may arise from using our products.



Supporting our Community

We have an important role to play in our communities, through supporting small business and collaborating with our philanthropic and foundation partners to deliver impactful outcomes where they are needed.



Nurturing our People

We strive to create a great place for our people to work, where we embrace their uniqueness, invest in their wellbeing and support their development.



Reducing our Environmental Impact

We take action to reduce our impact on the environment, through our business operations and influencing value chain activities.

Our Supply Chain

In FY24, The Lottery Corporation transacted with 489 suppliers from 11 countries (including Australia). Approximately 90% of supplier spend was with third parties who are based in Australia. Approximately 30 suppliers made up 80% of our total spend. The largest category of procurement spend was technology at 41%, which includes hardware and software purchases. Marketing, print and distribution made up approximately 32% and the remaining 27% of procurement spend was on services including property, travel, corporate and professional services.

The Lottery Corporation is at low risk of contributing to modern slavery because the majority of our supplier spend is within Australia, which is among the least vulnerable countries to modern slavery in the Asia Pacific region and globally, according to the Walk Free Global Slavery Index 2023 report, although we acknowledge the commodities in Table 1 (below) to be of higher inherent risk.

Table 1: Inherent risk commodities/services

Commodity	Examples	Inherent risk Factors
Textiles and garments	Clothing, branded apparel, uniforms, textiles	<ul style="list-style-type: none"> Links to high-risk geographies: Jurisdictions with insufficient/weak legal protections for workers Use of child labour: In the production of raw materials such as cotton. Excessive work hours: Common in factories producing garments. Absence of complaints and escalation process: Limited avenues for workers to report grievances.
Construction materials	Timber, steel, bricks, stones	<ul style="list-style-type: none"> Links to high-risk geographies: Sourced from countries with poor labour standards. Reliance on low-skilled and/or migrant labour: High vulnerability to exploitation. High levels of subcontracting: Creates opacity in labour practices.
Electronics and technology	Mobile phones, computers, other electronics	<ul style="list-style-type: none"> Links to high-risk geographies: Jurisdictions with insufficient/weak legal protections for workers. Use of child labour: In the extraction of minerals used in components. Complex supply chains: Difficult to monitor multiple tiers.
Cleaning service	Janitorial service in commercial buildings, public spaces	<ul style="list-style-type: none"> Reliance on low-skilled and/or migrant labour: High vulnerability to exploitation. High levels of subcontracting: Leads to wage theft and poor conditions. Absence of complaints and escalation process: Limited avenues for workers to report grievances.
Paper and pulp	Paper products, packaging materials	<ul style="list-style-type: none"> Links to high-risk geographies: Sourced from regions with weak labour protections. Reliance on low-skilled and/or migrant labour: High vulnerability to exploitation. Environmental impact: Deforestation linked to labour exploitation.

Commodity	Examples	Inherent risk Factors
Promotional items	Branded merchandise, giveaways, corporate gifts	<ul style="list-style-type: none"> Links to high-risk geographies: Jurisdictions with insufficient/weak legal protections for workers. Use of child labour: In the production of raw materials such as cotton. High volume orders: Pressure to cut corners on labour standards.
Coffee	Coffee beans, instant coffee, ground coffee	<ul style="list-style-type: none"> Links to high-risk geographies: Jurisdictions with insufficient/weak legal protections for workers. Reliance on low-skilled and/or migrant labour: High vulnerability to exploitation. Use of child labour: Common in coffee farming.

In FY24, less than 10% of our total supplier spend was with suppliers who are based outside Australia. The Lottery Corporation acknowledges that some modern slavery risks may be heightened based on the geographic location and industry of our overseas suppliers. To mitigate this risk, the locations of our overseas suppliers are considered to have a 'low' modern slavery risk based on the estimated prevalence and number of people living in modern slavery by country. This assessment was based on the risk classification under the Walk Free Global Slavery Index Report 2023 (refer to table 2).

Figure 1: Percentage of spend per high level category

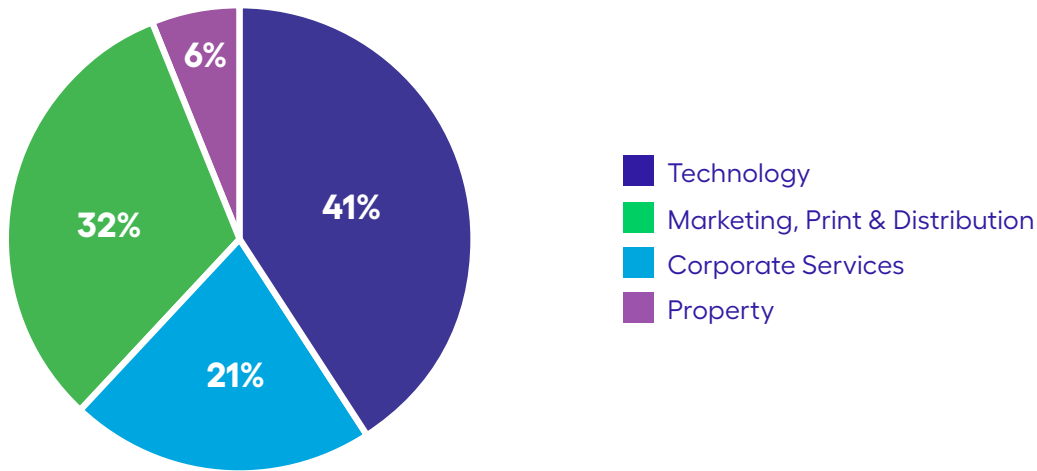


Figure 2: Number of suppliers per high level category

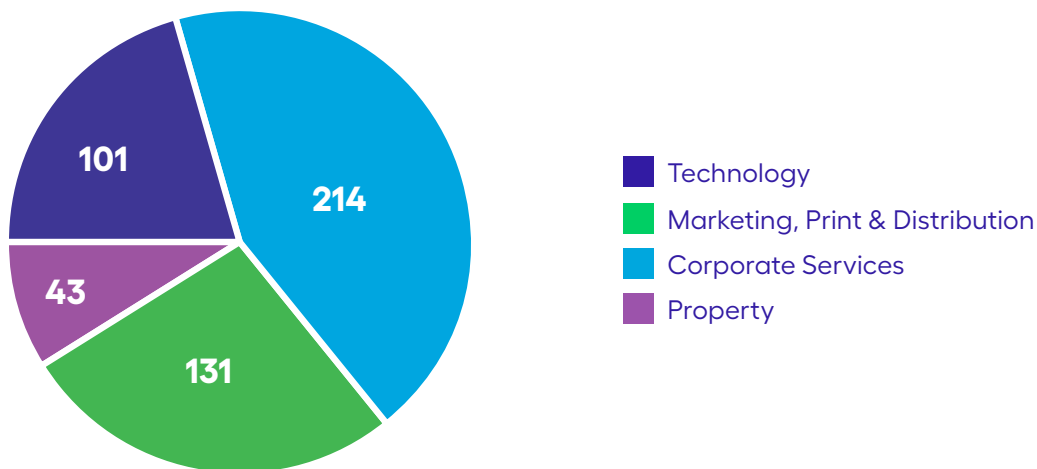
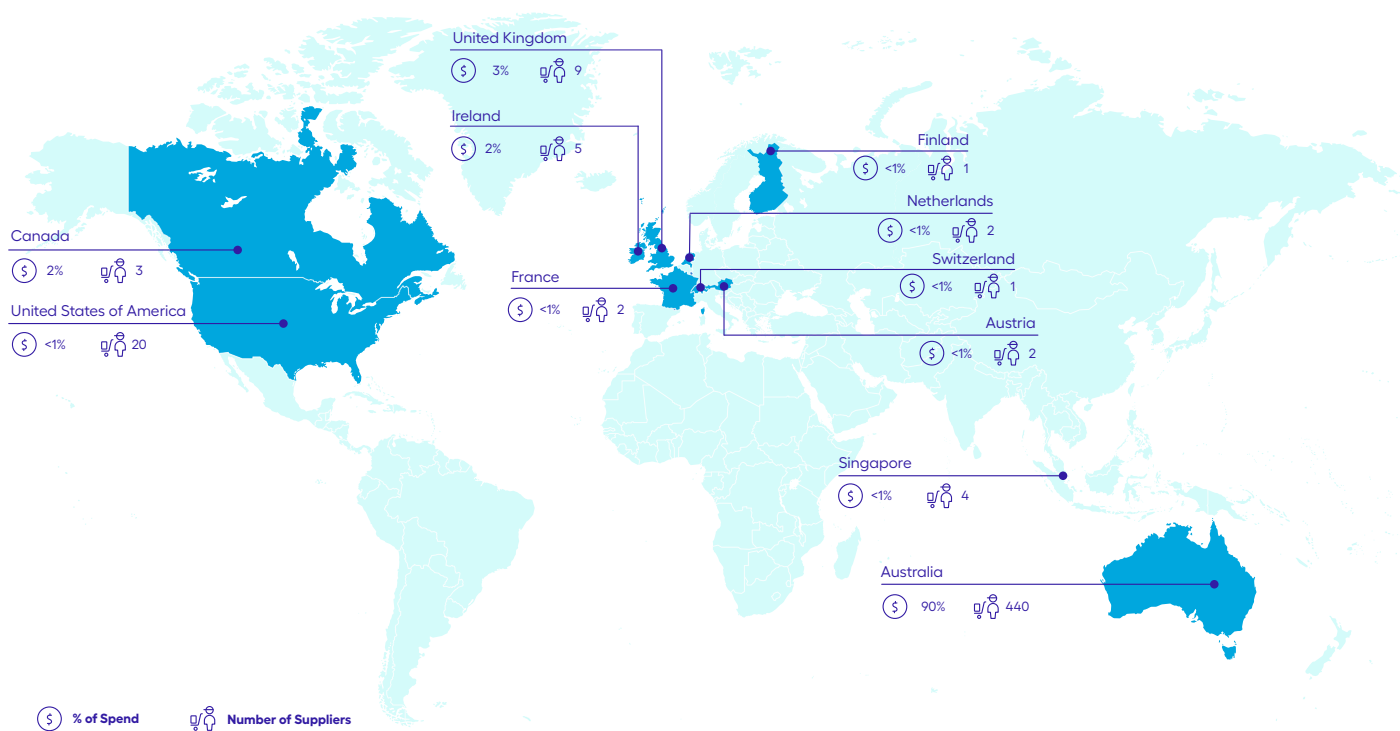


Table 2: Modern Slavery risk classification by Country

Country Name	Modern Slavery Risk
Australia	Low
Singapore	Low
USA	Low
Canada	Low
Austria	Low
Finland	Low
France	Low
Ireland	Low
Netherlands	Low
Switzerland	Low
UK	Low

Figure 3: Global summary of Suppliers



Note: Classification obtained from the Global Slavery Index 2023 report.

Governance and Board Engagement

Good corporate governance is fundamental to creating long term value for our stakeholders. The Lottery Corporation is committed to the highest standards of corporate governance, and to cultivating a culture of integrity and ethical conduct and supporting effective operation and management of our business.

Governance oversight in relation to human rights, including modern slavery, is undertaken by the Board of Directors, the ELT, Board Risk and Compliance Committee and project working group.

Board Oversight:

The Board is responsible for reviewing and monitoring systems and frameworks for risk management (for both financial and non-financial risks), internal control and legal compliance. This includes setting the risk appetite for The Lottery Corporation, reviewing procedures to identify the main risks associated with our business and the implementation of appropriate systems to monitor, manage effectively and report on these risks.

The Risk and Compliance Committee assists the Board in overseeing risk and compliance management. The Board oversee risk reporting via the Board Risk and Compliance Committee (BRCC). This includes reporting of existing organisational key risks, emerging risks and incidents to provide the BRCC with information and updates on the enterprise and operational risk environment. As part of The Lottery Corporation's policy framework, the Board are responsible for approving a number of organisation wide policies, including the Code of Conduct, Risk Management Policy and Whistleblower Policy.

A summary of our governance framework is outlined in the diagram below.



Management Oversight

To help manage the risk of modern slavery within our Group and our business network, a modern slavery project working group (PWG) has been established. In FY24, the PWG met regularly to help identify potential areas of concern that could contribute to modern slavery risk within the business. The PWG involves representatives from various areas of the Company, including the Procurement, Legal, Risk, Regulatory, ESG and People and Culture teams.

For more information on our governance framework, refer to our FY24 Corporate Governance Statement.

Risk Management & Policies

Risk Assessment Process:

The Lottery Corporation's enterprise risk management framework supports effective identification, monitoring, management, reporting and oversight of risks across the organisation that may impact the delivery of our strategy. The framework is based on concepts and principles identified in the Australian/New Zealand Standard on risk management (AS/NZS ISO 31000:2018). The framework is illustrated below.



The BRCC oversees the adequacy and effectiveness of the framework. Modern slavery risks are factored into the Board-endorsed Risk Taxonomy which is subject to Board oversight and reporting. This includes assessment of risk exposure levels factoring in the effectiveness of our control environment.

The risks of modern slavery practices in our operations and supply chain

There are three main ways in which a company can be involved with modern slavery. This is summarised in the table below along with the identified ways in which the risk of modern slavery could arise in The Lottery Corporation.

Table 3: Identified areas where modern slavery could arise:

	Cause	Contribute to	Directly linked
Description	'Cause' modern slavery directly through our operations	'Contribute to' modern slavery through acts or omissions that facilitate or incentivise it	'Directly linked' to modern slavery through our business relationships
Identified areas where modern slavery could arise:	Being an employer		
	Through our retailer network		
	Using suppliers		

These identified areas of risk are explained further below.

Employer Risks

We are focused on creating a diverse, equitable and inclusive workplace culture. Our practices reflect respect for all individuals, regardless of race, ethnicity, gender identity, sexual orientation, disability, or any other personal characteristic. Our employment framework is designed to enable compliance with local laws across all our entities, offering conditions that often exceed minimum legal requirements. We regularly review labour laws for alignment with our standards and promptly address any gaps. Our recruitment processes are designed to be fair and equitable, supporting diversity and verifying candidates' rights to work, compliance with age requirements, and promoting inclusive hiring practices.

Through these measures, we strive to meet industry standards in providing a safe, fair, and inclusive workplace, contributing to the prevention of modern slavery in all its forms.

Our approach to modern slavery is grounded in a commitment to safeguarding the rights and well-being of everyone connected to our operations. Our direct workforce is based in Australia with the majority of roles based at our corporate offices, call centres and warehouses and is considered to have a low risk of modern slavery. We recognise that the risk can exist in any country. We work to mitigate this risk through robust People and Culture practices, safety management systems, and regular training on human rights principles.

In addition to this, we maintain a Code of Conduct and comprehensive policies (outlined on page 17) including whistleblower mechanisms, to provide transparency and address any concerns where high standards of corporate conduct, integrity, ethics and governance are potentially compromised.

Retailer network risks

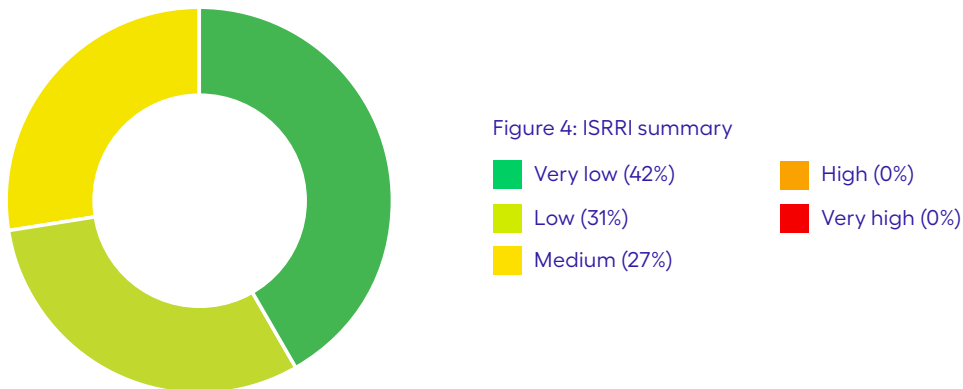
We recognise there is potential for modern slavery risk in our network of Australian lotteries and Keno retail partners, including newsagents, licensed venues and other retailers, by means of forced labour, debt bondage and deceptive recruiting practices. The workforce in our retailer network is made up of individuals recruited by our franchisees and other retail partners. Due to the nature of retailer network operations, the workforce includes lower skilled and/or casual workers with indirect employment arrangements in place. This can increase modern slavery risk.

The Lottery Corporation's retailer network is solely Australian-based and therefore not directly exposed to countries that have a higher risk of modern slavery. We have a proactive approach to help mitigate the risk of modern slavery within the retail network, including surveying the lotteries retailers regularly to validate that they are meeting Fair Work requirements and obligations under relevant Australian law. This mandatory survey includes questions for both franchisees and their employees on a number of key areas including industrial arrangements, superannuation, payslips and if the employee believes they are being paid correctly for the hours worked. Results are collated, and if any discrepancies or concerns arise, The Lottery Corporation requests supporting evidence and conducts further follow-ups with the franchisee with a view to resolving any concerns.

Supplier risks

We recognise that the risk of modern slavery can arise through our suppliers. As of the date of this Modern Slavery Statement, The Lottery Corporation continues to rely on key infrastructure and third-party commercial arrangements for the operation of its business. Refer to Our Supply Chain section on page 10-12 for more details on the volume, risk rating and the nature of our suppliers.

To assist us in managing, identifying and assessing modern slavery risks for each of our third-party suppliers, we have implemented a specialist Environmental and Social Performance provider third-party tool. As part of this assessment tool, approximately 91% of our suppliers have been assigned a modern slavery risk index rating, with industry risk and overseas supplier risk forming part of this determination. There are no suppliers with a rating of high or very high. The Lottery Corporation has approximately 27% medium-risk suppliers and approximately 73% low and very low-risk suppliers (as seen in figure 4 below). The proportion of medium-rated suppliers is predominantly driven by the industry risk, including electronics and technology, cleaning services and promotional items. This risk rating methodology will help inform our ongoing approach to modern slavery risks, as further described in the Looking Ahead section on page 25.



Compliance Management

The Lottery Corporation operates in a highly regulated environment resulting in many legislative and licence obligations with which the Company needs to comply. Our compliance management framework sets out key expectations for all employees and their compliance obligations, including those relating to modern slavery.

In FY24 we strengthened our compliance management framework by simplifying our compliance obligations register to help improve understanding of and clarify accountability for compliance.

Our mitigation of risk relating to modern slavery harm is continually evolving, and The Lottery Corporation intends to improve further the quality of documented compliance processes so that these obligations are understood and managed appropriately.

Our Supplier code of conduct and Policies

Our policies help our employees to feel safe, included and supported at work. We provide governance of our approach by consistently reviewing, updating and enhancing our policies to align with our principles and regulatory/legislative changes, and considering feedback from our people.

Our Code of Conduct guides the way we work and sets out standards and expectations of team members on how we behave and how we conduct our business. It is designed to support achievement of ethical, responsible and sustainable business practices. All employees, contractors and Directors of The Lottery Corporation must adhere to the requirements of our Code of Conduct. A copy is provided to new employees as part of the onboarding process, and mandatory training must be completed upon joining. Ongoing refresher training is also required as a condition of employment.

Our Supplier Code of Conduct states that where possible, we are to engage our suppliers on our standard terms and conditions or incorporate our Supplier Code of Conduct into their terms and conditions. We have introduced a new Enterprise Resource Planning (ERP) system that has made it easier for us to incorporate the Supplier Code of Conduct for our new suppliers and allows us to track the number of suppliers who have read and agreed to our code.

The Whistleblower Policy encourages, supports and enables eligible whistleblowers such as employees, contractors and suppliers to utilise a confidential channel to speak up about actual or suspected misconduct or an improper state of affairs or circumstances in relation to The Lottery Corporation. This includes an external and independently run, anonymous and secure service to ensure people can voice concerns in confidence. The Whistleblower Policy and framework is overseen by an internal Whistleblower Committee, consisting of two ELT members, which has accountability and a direct reporting line to the Audit Committee.

Other key policies include our Sanctions Policy, Anti-Bribery and Corruption Policy, Health Safety and Wellbeing Policy.

In FY24, we conducted a review of our Procurement Policy. The revised policy strives to support sustainable, strategic and commercial excellence. As part of the uplift, a clearer scope, guiding principles, and documentation of a roles and responsibilities matrix were established for creating, deploying, managing and monitoring modern slavery training requirements.

Our policies continue to be reviewed and updated periodically with oversight from the management Policy Committee, and where relevant, from the ELT and the Board.

Supplier Due Diligence and Risk Assessments

Our Risk-Based Approach to Supplier Management

Consistent with the Walk Free framework, The Lottery Corporation has initially focussed our risk assessments on suppliers where we have the most influence and are inherently our most strategic. The Lottery corporation has used this methodology to then prioritise where there is the greatest modern slavery risk within our operations and supply chain.

Robust due diligence processes are crucial in identifying risks related to modern slavery violations. Our due diligence framework includes several key components to help identify, prevent, and mitigate modern slavery risks within our operations and supply chains. By engaging with suppliers at key stages — the Company has adopted a multi-faceted approach to mitigating modern slavery risks.

Supplier Pre-Qualification

Our supplier pre-qualification processes were strengthened in FY24 as we developed and integrated initial due diligence measures into our supplier qualification templates and incorporated some third-party risk assessments into the procurement lifecycle. We aim to expand and refine these processes, building towards a more comprehensive and mandatory framework, including the third-party risk management framework to help mitigate third-party management risk exposures including modern slavery related risks.

A new supplier portal was implemented during the reporting period to help manage the registration and onboarding of new suppliers. We have embedded our Supplier Code of Conduct into the portal as part of the onboarding process, and we require suppliers to comply with this code which sets out clear expectations on preventing involuntary labour, protecting human rights, and promoting ethical business practices. Adherence to the Supplier Code of Conduct helps suppliers operate in a manner consistent with our values and legal obligations.

Supplier Contracts and Obligations

The Lottery Corporation's supplier contract templates continue to be a key control to help address the risk of modern slavery through:

- Specific contract clauses that outline requirements of our suppliers to comply with relevant modern slavery and human rights laws;
- Requirements for suppliers to adhere with our Supplier Code of Conduct;
- Details on our Whistleblower Policy so that suppliers and employees understand how to speak up and report concerns, including modern slavery issues;
- Audit and inspection rights so we can request and access supplier policies and procedures; and
- Clear expectations that any breach of these requirements can result in The Lottery Corporation having the right to terminate the supplier's contract.

Third-Party Monitoring and Evaluation

The Lottery Corporation leverages specialist third-party application to assess suppliers for inherent modern slavery risks based on geographic location and industry.

To date, we have assessed approximately 91% of our suppliers through this application, which allows us to enhance our risk identification and assess risks associated with supplier locations and industries more comprehensively.

This third-party application has increased our visibility over suppliers, and we utilise it to engage with our suppliers through the platform when conducting comprehensive risk assessments such as our self-assessment questionnaire (SAQ) and sustainability survey.

To date there aren't any suppliers with a rating of 'high' or 'very high'. The 'medium' rated suppliers are predominantly driven by the industry risk and high-risk commodities such as electronics and technology, cleaning services and promotional items. See details in table 4 below.

As mentioned above, this risk rating methodology helps inform our ongoing approach to modern slavery risks.

Table 4 Risk analysis post third-party application

Risk groups		
Overall risk	Count	Percentage total
Very low	222	42%
Low	164	31%
Medium	146	27%
High	0	0%
Very high	0	0%

Strengthening our Supplier Due Diligence through Third-Party Risk Management

As The Lottery Corporation continues to evolve its risk management processes and policies, a key focus will remain on developing a third-party risk management (TPRM) framework.

Suppliers' risks will be assessed specifically against The Lottery Corporation's risk management framework, which helps define our categories of risk and control areas to help guide our TPRM program. These are used to frame the types of risks and associated controls, that should be assessed and evaluated when onboarding a new third party or managing an existing third party. Modern slavery is considered a critical component of effective third-party risk management.

The development of a third-party risk management is an important step in strengthening our supplier risk management and will help The Lottery Corporation work towards more sustainable and ethical practices in our supply chain.



Grievance Mechanisms & Remediation:

Grievance mechanisms are another key component when addressing modern slavery issues within our operations and supply chains. The Lottery Corporation’s Whistleblower Policy is designed to make employees and suppliers feel empowered and supported to speak up for what’s right. Eligible whistleblowers can report conduct in relation to The Lottery Corporation group that seems improper, including breaches of relevant Commonwealth laws. Reports can be submitted anonymously via several channels, including an independent and secure whistleblower service delivered by Deloitte, available anytime.

The Lottery Corporation understands that effective remediation processes can help better manage our risks, reinforce our corporate governance and culture, and help demonstrate we are taking meaningful steps to identify and respond to modern slavery risks. Our Whistleblower Policy, relevant contract clauses and internal policies and processes all currently act to support the overall remediation framework.

To help strengthen our existing measures, a remediation framework guide has been drafted. This guide aims to provide clear guidelines and processes for addressing any instances of modern slavery that may arise. The key principles (below) of our proposed remediation framework are influenced by the UN Guiding Principles on Business and Human Rights with a key focus on being accessible, transparent and a source of continuous learning.



Actions completed in FY24

Over this reporting period, we made meaningful progress on our actions to assist in addressing the modern slavery risks associated with our operations and supply chains. These are set out below.

1. Strengthening employee awareness and training:

We uplifted and expanded the modern slavery online learning module for all employees and contractors at The Lottery Corporation. This included making the learning module an ongoing mandatory learning obligation to help raise awareness and provide training on how to identify potential modern slavery risks.

2. Refining modern slavery and human rights contractual clauses:

We undertook a review of our modern slavery clauses in our template supplier contracts. As part of the review, we identified labour rights as one of our modern slavery risks. Relevant template contractual clauses were refined by taking a risk-based approach and to align with best practice for modern slavery risk management.

3. Hosting knowledge sharing and 'Share and Learn' sessions:

We co-hosted a modern slavery roundtable with several industry peers across the Asia Pacific procurement member network. The session focused on modern slavery identification, promoting transparency and embedding risk assessments for more effective risk management. We continued to promote industry collaboration and knowledge sharing through participation at numerous industry events in FY24 and used these knowledge sharing sessions to facilitate valuable exchanges of insights and strategies to strengthen our collective efforts against modern slavery.

In addition to peer events, we hosted a 'Share and Learn' session for our employees and contractors ahead of the launch of the mandatory learning module. The session focussed on raising awareness of modern slavery risks, especially those forms that could be more prevalent in our supply chains, and outlined The Lottery Corporation's actions to help combat these risks. The session outlined clear methods for identifying and actioning any potential modern slavery risks, including steps employees and contractors can take to help mitigate these harms within our business and supply chains.

4. Extending our assessment of modern slavery risks:

We further strengthened our due diligence requirements and issued SAQs to our most strategic suppliers through our third-party modern slavery platform. We also increased our modern slavery screening and qualification procedures by introducing pre-qualification requirements such as evidence from suppliers of statements and policies that specifically relate to modern slavery in our tender processes.

5. Annual supplier and sustainability survey:

We developed an annual supplier survey and sustainability assessment for our most material (tier 0) suppliers. These suppliers fall into a category that require regulatory approval and are some of our most important engagements. The purpose of the assessment was to help enhance our supplier engagement and help suppliers adhere to our ethical standards and sustainability objectives.

6. Development of modern slavery roadmap:

In FY24 we completed the development of a detailed three-year modern slavery roadmap to help guide the actions we will undertake over the next three years. We will continue to regularly evaluate progress and undertake annual reviews of the roadmap.

7. Initiating the development of a remediation framework:

A formal modern slavery remediation framework was drafted for the purpose of providing guidance and support to all relevant stakeholders. This guide aims to bring together current grievance mechanisms such as whistleblower hotlines, our contract clauses with clear dispute resolution provisions, and internal policies and processes across five key principles (as outlined on page 20).

Case study: Building supplier capability

We have developed a specific modern slavery resource, 'Supplier toolkit' for The Lottery Corporation to communicate our expectations to suppliers and ensure they know how to engage with us on any concerns relating to modern slavery and human rights. As part of raising our suppliers' awareness, we are keen to help those suppliers who may require additional support to improve on and address any modern slavery risks in our supply chain. The toolkit supports improving transparency within our supply chain and promotes collaboration.

How we assess the effectiveness of our actions

We monitor the effectiveness of our actions, processes and policies that address modern slavery at The Lottery Corporation. In FY24 we assessed the effectiveness of our commitments and actions through several ways including:

Enhance employee awareness and training:

We monitored the percentage of employees and contractors that were assigned and completed the mandatory learning module, including incorporating feedback mechanisms and suggestions for improvements. We also conducted a 'Lunch and Learn' session in relation to the module to help raise awareness, purpose and understanding of modern slavery harms. This year we achieved a training completion rate across The Lottery Corporation of 99.8% corroborating our Group-wide commitment to fostering a culture of awareness and responsibility.

Strengthening Due Diligence:

During the period we enhanced our due diligence processes to better identify and mitigate modern slavery risks using our third-party tool and supplier questionnaires. Using our specialised third-party tool, we were able to effectively assess more than 90% of our suppliers based on an inherent risk-based approach using our suppliers' geographic location and primary industry. We were able to incorporate comprehensive risk assessments and assessed a further 20% of our suppliers during this reporting period.

Collaboration and cross-functional working group:

Collaboration between the Legal and Procurement teams enables effective updates to our contract templates to align with The Lottery Corporation's strategic goals. The PWG meets regularly, with well attended meetings and with good outputs demonstrating this cross-functional working group's effectiveness.

Stakeholder Engagement

The Lottery Corporation recognises the importance of collaboratively engaging in with relevant stakeholders, including industry groups, governments, and non-government organisations.

Internal collaboration

Management of modern slavery issues at the Lottery Corporation is supported by the modern slavery project working group. In FY24 the PWG continued to meet as a cross functional working group dedicated to modern slavery risk management and address any issues and areas in which we should focus. The PWG involves representatives from Procurement, Legal, Risk, Regulatory, Sustainability and People and Culture teams.

External collaboration

In FY24, we participated in industry initiatives and forums and collaborated with peers to share best practice and discuss collective approaches to modern slavery. We hosted and participated in educational networking events, roundtables and webinars, focused on modern slavery, where stakeholders collaborate, share experiences, and discuss modern slavery risks.

We were involved in a number of multi-stakeholder initiatives with a focus on shared learning and collective action. These initiatives with industry leaders such Procurement Leaders, Informed 365 and Fair Supply included roundtables, webinars and information sharing sessions. We are also a member of and actively involved in the Fair Supply, Sustainability Practitioners Association.

These efforts help improve our risk management knowledge and capabilities and assist us to stay informed and proactive in addressing modern slavery risks.

Looking Ahead

In FY25, The Lottery Corporation intends to improve its modern slavery risk mitigation processes and enhance modern slavery prevention measures by:

- Continuing to focus on training and awareness programs for employees to help provide the knowledge and skills to identify, prevent and mitigate any modern slavery risks. This will include expanding the program to include ethical and sustainable sourcing practices;
- Reviewing and strengthening our modern slavery governance framework;
- Focusing on supplier collaboration by rolling out a training and resources 'supplier toolkit' to help outline our expectations for our suppliers. Our key focus is on suppliers where we source higher risk commodities (as per table 1);
- Developing a modern slavery scorecard, with targets and key performance indicators to measure the impact of our actions, such as the percentage of supplier toolkits distributed and training completion rates;
- Strengthening supplier risk assessment processes by implementing a TPRM framework and initiating a program, which includes due diligence, risk segmentation, continuous monitoring and incident reporting; and
- Continuing to engage and strengthen our partnerships with industry groups and stakeholders to promote collaborative approaches to the management of modern slavery.

Appendix

Appendix: Mandatory Reporting Criteria

The table below sets out the key modern slavery reporting criteria contained in the Modern Slavery Act 2018 (Cth), together with page references as to where this information is located in this statement.

Modern Slavery Act 2018 requirements	Page
Mandatory Criterion 1: identify the reporting entity.	5
Mandatory Criterion 2: describe the structure, operations, and supply chains of the reporting entity.	6-12
Mandatory Criterion 3: describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	14-16
Mandatory Criterion 4: describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	18-22
Mandatory Criterion 5: describe how the reporting entity assesses the effectiveness of such actions.	23
Mandatory Criterion 6: describe the process of consultation with: <ul style="list-style-type: none"> (i) any entities that the reporting entity owns or controls and (ii) in the case of a reporting entity covered by a statement under section 14—the entity giving the statement. 	5, 13
Mandatory Criterion 7: include any other information that the reporting entity, or the entity giving the statement, considers relevant.	17, 24

Glossary

Board: The Lottery Corporation's Board of Directors.

Code of Conduct: A set of principles and rules that outline The Lottery Corporation's expectations regarding ethical behaviour and integrity in its operations. It sets out expectations that employees and partners comply with ethical standards, human rights, and labour laws, fostering responsible business conduct.

Compliance Management: Our Compliance Management Policy (and Standard) document sets out how we manage compliance at The Lottery Corporation. It is referring to the coordinated actions to identify, assess, address and monitor compliance to obligation.

ELT: The Lottery Corporation's Executive Leadership Team.

Fair Supply: Fair Supply is a global modern slavery and ESG data provider and consultancy. Fair Supply provides business and institutional customers with visibility over modern slavery and ESG risk along the supply chain.

Informed 365: A corporate social responsibility application and technology platform used to take a proactive approach to engage suppliers around modern slavery risks.

Procurement Leaders: A global network and intelligence platform that provides procurement professionals with resources, insights, and tools such as building responsible procurement processes by offering best practices, risk management frameworks, and guidance on ethical sourcing and compliance with modern slavery legislation.

PWG: Project Working Group

Supplier Assessment Questionnaire (SAQ): A tool used by companies to gather information from their suppliers regarding their operations, policies, and potential risks. In modern slavery contexts, an SAQ is employed to evaluate supplier compliance with human rights standards, identifying risks related to modern slavery.

Supplier Code of Conduct: A document that establishes the ethical expectations and standards suppliers must adhere to when doing business with The Lottery Corporation. It addresses key issues such as forced labour, fair wages, working conditions, and human rights protections, in line with Modern Slavery legislation.

Tabcorp: Tabcorp Holdings Limited

Third-Party Risk Management Framework (TPRM): A structured approach used to identify, assess, and mitigate risks posed by third-party suppliers, including risks related to modern slavery.

Tier 0 suppliers: These are the suppliers that are defined by The Lottery Corporation as our regulated and most strategic suppliers.

Walk Free Global Slavery Index: Walk Free is an international human rights group focused on the eradication of modern slavery, in all its forms. Walk Free's flagship report, the Global Slavery Index (GSI) provides national estimates of modern slavery for 160 countries.



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