



**Ainsworth Game Technology Ltd**  
ABN 37 068 516 665

10 Holker Street,  
Newington NSW 2127  
Tel: +61 2 9739 8000

[www.agtslots.com.au](http://www.agtslots.com.au)

## **Modern Slavery Statement**

### **Introduction**

Ainsworth Game Technology Limited and its group companies ('AGT') are committed to improving our practices to combat slavery of all forms including "modern slavery" as defined in the Modern Slavery Act 2018 (Cth).

This statement provides a summary of:

- AGT's structure, operations, and supply chain; and
- the efforts taken by AGT to minimise the risk of modern slavery practices within AGT's operations and supply chain.

### **AGT structure**

AGT is a manufacturer of gaming machines and game software that is supplied to and operated by licensed hospitality venues such as hotels, clubs, and casinos all over the world. AGT also supplies its game software to licensed online casino's based in Europe, North America and Latin America.

AGT is licensed to manufacture and supply its gaming products and game software into all major global gaming jurisdictions. To support its operations, AGT has two main offices, one situated in Sydney, NSW, Australia and the other in Las Vegas Nevada, USA, and it holds over 335 licenses issued by gaming regulatory authorities.

AGT employs over 500 employees worldwide that work within the following core global functions:

- Sales and Marketing
- Manufacturing
- Software and Platforms Research and Development
- Game Development
- Online/Interactive
- Business Services and Information Technology
- Finance; and
- Legal and Compliance

All of the above functions report to the AGT Chief Executive Officer, who in turn reports to the AGT Board of Directors.

In preparing this statement AGT has acted in consultation with all AGT Group entities and functions owned or controlled by Ainsworth Game Technology Limited.

For more information on AGT's structure, business, operations and financial performance please go to the 'Investor' section of AGT's website at [www.agtslots.com](http://www.agtslots.com) and access a copy of our 2021 Annual Report.

### **AGT's supply chains**

AGT's supply chain and business operations have not materially changed since the publication of AGT's initial Modern Slavery Statement dated 16 December 2020.

AGT's supply chain includes:

- Manufacturers, developers and suppliers of bespoke and "off the shelf" computer hardware, firmware and software;
- Suppliers and manufacturers of "made to specification" componentry including gaming machine cabinet parts; and
- Developers of game concepts and related software.

### **Our policies on slavery**

The AGT Group has zero tolerance of slavery.

AGT's Anti-slavery Policy reflects AGT's commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective systems and controls to ensure slavery is not taking place.

Ensuring compliance by all employees and functions of AGT Group to the requirements of the AGT Anti-Slavery Policy is vested in AGT's "Regulatory and Compliance Committee", a subcommittee of the AGT Board of Directors.

The AGT Regulatory and Compliance Committee is comprised of one independent non-executive member of the AGT Board of Directors, one senior executive of AGT and an independent outside consultant to AGT who has knowledge of applicable gaming laws and has extensive experience in dealing with issues of regulatory compliance.

A copy of AGT's Anti-slavery Policy is attached as Annexure A and a copy of the charter of the AGT Regulatory and Compliance Committee can be accessed at [https://www.agtslots.com/assets/RCC-Charter\\_230621.pdf](https://www.agtslots.com/assets/RCC-Charter_230621.pdf).

### **Modern Slavery Risk Assessment**

AGT is a high compliance organisation that regularly reviews through its Regulatory and Compliance Committee, the probity, integrity and suitability of all persons that deal with or engage with the AGT Group, including all participants in the AGT supply chain.

In addition, AGT executives frequently travel to the premises of its local and international supplier's to ensure they have the capabilities to deliver on their supply chain commitment, and to confirm their suitability to be associated with AGT. Plainly the ability for AGT executives to conduct these assessments in person has been impacted by the current restrictions on international travel caused by the COVID-19 pandemic.

For more information on the role and responsibility of the AGT Regulatory and Compliance Committee please see the AGT Regulatory and Compliance Committee Charter available at the ‘Corporate Governance’ section of AGT’s website at [www.agtslots.com](http://www.agtslots.com).

AGT’s policy, processes and resources now include a requirement that AGT suppliers of goods or services within AGT supply chain respond to a modern slavery due diligence questionnaire that asks each supplier to:

- adopt (if they haven’t already) the requirements of AGT’s Anti-slavery Policy (or disclose their own similar policies); and
- disclose to AGT the details of their own supply chains and or the efforts undertaken by them to identify and assess potential risk areas within their supply chains concerning the potential existence of modern slavery. Specifically, each supplier is asked to disclose details of their own supply chains including their geographical location.

AGT’s Legal and Compliance department in conjunction with AGT’s procurement and manufacturing departments, monitor all responses received and depending on the response, works with each AGT executive manager to identify and implement follow up action on specific suppliers as required.

In reviewing the responses received to its modern slavery due diligence questionnaire, AGT applies a risk-based approach. For example, suppliers that have operations or their own supply chains within developing countries are identified for further inquiry on a case-by-case basis.

The due diligence investigation and review of AGT’s supply chain is an ongoing process and AGT continues to work with some of its suppliers in seeking responses to follow up queries.

AGT is now focussing its due diligence efforts on suppliers that are either based in developing countries or that rely upon supply chains that are based in developing countries.

As at the date of this statement no suppliers within AGT’s supply chain have been identified as non-compliant with the requirements of AGT’s Anti-slavery Policy or the applicable requirements of the Modern Slavery Act 2018 (Cth) for the reporting period through to 30 June 2021.

### **Supporting Resources and Policies**

The AGT Regulatory Compliance Committee is supported as required in implementing AGT’s Anti-slavery Policy by the resources and representatives from the following AGT departments based in Australia and in the USA:

- Legal
- Regulatory Compliance
- Human resources;
- Manufacturing; and
- Finance.

AGT’s Anti-slavery Policy is also supported by the AGT policies set out below. These policies are available for review at the ‘Corporate Governance’ section of AGT’s website at [www.agtslots.com](http://www.agtslots.com).

POLICY/PROCEDURE	PURPOSE
<i>Employee Code of Conduct</i>	How AGT expects employees to behave towards each other, our customers, suppliers and the broader community.
<i>Fraud, Anti-Bribery and Corruption Policy</i>	Outlines AGT’s commitment to complying with laws and regulation addressing fraud, bribery and corruption in each country in which AGT conducts business.
<i>Whistle-Blower Protection Policy</i>	To support AGT’s policies, AGT’s values, code of conduct and ethics policy, its long-term sustainability and reputation, and to meet its legal and regulatory obligations through the provision of transparency around AGT’s framework for receiving, handling and investigating disclosures of unlawful activity or breach of policies.

Through the above policies, processes and resources AGT seeks to:

- Identify and assess potential risk areas in AGT’s supply chain;
- Mitigate the risk of modern slavery occurring in AGT’s supply chain;
- Monitor potential risk areas in AGT’s supply chain; and
- Protect whistle-blowers that may identify the existence of modern slavery (or any other unlawful activity) within AGT’s supply chain.

### **Contracts**

Other means by which AGT controls its potential risk of modern slavery is through its contracting process with its major suppliers. Modern slavery specific provisions have been incorporated into AGT’s main supply agreements, and these provisions are or have been presented to AGT’s major suppliers for acceptance either as they come up for renewal or by way of separate agreement addendums.

### **Training**

To ensure a high level of understanding of the risks of modern slavery in AGT’s supply chain AGT has required staff that either manage key geographical areas that are at perceived risk of modern slavery practices or staff that have responsibility for the ongoing implementation of Ainsworth’s key procurement and compliance policies and processes to undertake Modern Slavery awareness training.

### **Compliance Process**

Ainsworth has further revised its key vendors and supplier’s due diligence and probity review processes to include an ongoing and updated assessment of a supplier’s anti modern slavery initiatives when a supplier’s broader gaming regulatory compliance status and suitability is assessed and or updated.



### **Assessing the Effectiveness of our Actions**

AGT is continually working to better understand the effectiveness and impact of the initiatives detailed in this statement. The non-identification of modern slavery practices within AGT's supply chain to date provides some comfort AGT's current initiatives have been effective in minimising the risk of modern slavery within the AGT supply chain. However, the opportunity to re-engage directly with suppliers at onsite inspections in 2022 will further inform this assessment and the requirement for further action.

**This modern slavery statement is made by Ainsworth Game Technology Limited for the financial year ending 30 June 2021.**

**This statement was approved by our Board of Directors on 21 December 2021.**

A handwritten signature in black ink that reads 'D. Gladstone'.

**Danny Gladstone**

**Chairman**

**Date: 21 December 2021**



<b>Document Title:</b>	Modern Slavery Policy
<b>Department:</b>	Legal
<b>Approved by:</b>	General Counsel

<b>Documents No.</b>	990937	<b>Type:</b>	P
<b>Revision:</b>	B		
<b>Issue date:</b>	24/06/2020		

## 1. POLICY STATEMENT

- 1.1 Slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour, forced marriage, debt bondage and human trafficking, whether adults or children, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain. We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.
- 1.2 We are also committed to ensuring there is transparency in our own business and in our approach to tackling modern slavery throughout our supply chains. We expect the same high standards from all of our contractors, suppliers and other business partners. As part of our contracting processes, we include specific prohibitions against the use of forced, compulsory or trafficked labour, or anyone held in slavery, servitude or debt bondage, whether adults or children, and we expect that our suppliers will hold their own suppliers to the same high standards.
- 1.3 This policy applies to all persons working for us or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.
- 1.4 This policy does not form part of any employee's contract of employment and we may amend it at any time.

## 2. RESPONSIBILITY FOR THE POLICY

- 2.1 The Board of Directors has overall responsibility for ensuring this policy complies with our legal and ethical obligations, and that all those under our control comply with it. The Board of Directors are also responsible for approving our annual modern slavery statement and ensuring that it complies with our disclosure obligations under Australian modern slavery legislation.
- 2.2 The office of General Counsel has primary and day-to-day responsibility for implementing this policy, monitoring its use and effectiveness and dealing with any queries about it. These responsibilities extend to:
  - a) monitoring, consulting and auditing internal controls and procedures to identify risks of modern slavery practices in our operations;
  - b) monitoring and consulting with our suppliers, contractors and business partners to identify risks of modern slavery practices in our supply chains;
  - c) developing measures to assess and address any risks of modern slavery practices, including through due diligence in our contractual relations;
  - d) monitoring the effectiveness of those measures;
  - e) developing appropriate training materials and programs for our employees to comply with this policy.
  - f) Preparing our annual modern slavery statement.
- 2.3 Management at all levels are responsible for ensuring those reporting to them understand and comply with this policy and are given adequate and regular training on it and the issue of modern

slavery in supply chains, including any areas of our business and supply chains which are identified as at risk of modern slavery practices.

- 2.4 You are invited to comment on this policy and suggest ways in which it might be improved. Comments, suggestions and queries are encouraged and should be addressed to the General Counsel.

### **3. COMPLIANCE WITH THE POLICY**

- 3.1 You must ensure that you read, understand and comply with this policy.
- 3.2 The prevention, detection and reporting of modern slavery in any part of our business or supply chains is the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.
- 3.3 You must notify the General Counsel as soon as possible if you believe or suspect that a conflict with this policy has occurred or may occur in the future.
- 3.4 You are encouraged to raise concerns about any issue or suspicion of modern slavery in any parts of our business or supply chains of any supplier tier at the earliest possible stage.
- 3.5 If you believe or suspect a breach of this policy has occurred or that it may occur, you must notify your manager or report it in accordance with our Whistleblower Policy and portal as soon as possible.

**Refer:-** ■ *Whistleblower Policy*     *Document #990043*

- 3.6 If you are unsure about whether a particular act, the treatment of workers more generally or their working conditions within any tier of our supply chains constitutes any of the various forms of modern slavery, raise it with the General Counsel.
- 3.7 We aim to encourage openness and will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. We are committed to ensuring no one suffers any detrimental treatment as a result of reporting in good faith their suspicion that modern slavery of whatever form is or may be taking place in any part of our own business or in any of our supply chains. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern. If you believe that you have suffered any such treatment, you should inform the Compliance Officer immediately. If the matter is not remedied, and you are an employee, you should raise it formally using our Grievance Procedure.

**Refer:-** ■ *Grievance Procedure*     *Document #990025*

### **4. COMMUNICATION AND AWARENESS OF THIS POLICY**

- 4.1 We will provide training to all our employees on this policy. This will include training on how to identify modern slavery practices and the particular parts of our business and supply chains which are subject to a greater risk of modern slavery practices.

### **5. BREACHES OF THIS POLICY**

- 5.1 Any employee who breaches this policy will face disciplinary action, which could result in dismissal for misconduct or gross misconduct.
- 5.2 We may terminate our relationship with other individuals and organisations working on our behalf if they breach this policy.



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<b>Documents No.</b>	990937	<b>Type:</b>	P
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**AMENDMENTS / CHANGE HISTORY**

Rev	Date	Description of Changes	Reviewed by	Approved by
A	21/09/20	/ Creation / Re-formatted document	D.Greenslade	Board of Directors
B	15/12/20	/ Corrected Approval date to 24/06/2020	D.Greenslade	Board of Directors
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**MODERN SLAVERY DUE DILIGENCE  
QUESTIONNAIRE**

**1. PURPOSE OF THIS QUESTIONNAIRE**

The purpose of this information request is to help Ainsworth Game Technology Limited and all companies within the Ainsworth Group (“AGT”) with our due diligence procedures to assess the risk of modern slavery in our supply chain.

Your responses to this questionnaire will help us to identify and assess the risk of modern slavery in our supply chain.

**2. INSTRUCTIONS FOR COMPLETING THE QUESTIONNAIRE**

- 2.1 Provide your responses to the questionnaire, including appropriate supporting documents within seven business days by no later than \_\_\_/\_\_\_/\_\_\_.
- 2.2 This is an initial request for information, and we may ask for further information in due course.
- 2.3 Include appropriate cross-references where the same information and documents are to be supplied in response to two or more different questions. You do not need to repeat your response.
- 2.4 Update your responses as more information becomes available or if subsequent events make any earlier responses inaccurate.
- 2.5 To assist in our due diligence we may hold interviews with the employees, workers, subcontractors and agents.

**Please provide the following information and documents:**

**3. STRUCTURE**

- 3.1 Details of the following information in relation to the business:
  - a) full [company OR partnership OR entity] name;
  - b) any business name(s); and
  - c) registered office address.
- 3.2 Details of any sub-contractors used by you regarding the supply of your goods and services.

**4. POLICIES**

- 4.1 Have you agreed/do you agree, to comply with our modern slavery policy attached as annexure 1 to this document?
- 4.2 Does your organisation have any written policies and procedures relating to modern slavery, human rights, ethical trading and/or whistleblowing? If so, please provide copies or links to where these documents can be accessed.
- 4.3 Is there any other document or values statement by your organisation that you wish to bring to our attention? If so, please provide copies or links to where these documents can be accessed.
- 4.4 How frequently are your modern slavery policies and procedures updated (if any)?
- 4.5 Is your organisation a signatory to, or a member of, any ethical trading or ethical working conditions initiatives, or modern slavery initiatives or charters? If so, please provide details.

- 5.1 Who are your direct and indirect suppliers and subcontractors for the supply of goods and services by you to us and in which countries do they primarily operate?
- 5.2 Which relationships are critical for the supply of goods and services by you to us?
- 5.3 Who is responsible for managing these relationships?
- 5.4 How frequently do you review these relationships?
- 5.5 Please provide details of any steps you take to mitigate the risk of modern slavery affecting your supply chains, including any labour-related due diligence you conduct on the above suppliers.

## **6. GOODS AND SERVICES**

- 6.1 Where are raw materials or components for your products sourced from?
- 6.2 Are you aware of any raised risk of modern slavery relating to the supply of raw material or products to us? If so, please provide details.
- 6.3 Is any of the work for the provision of services by you outsourced? If so, please provide details.
- 6.4 Are any services provided by you using contract workers or seasonal workers? If so, please provide details.

## **7. COMPLIANCE**

- 7.1 How is compliance by you with AGT's or your modern slavery policies and procedures monitored?
- 7.2 Is senior management involved in enforcing the modern slavery policies? What actions follow from a breach of the policy?
- 7.3 Have there been any reports of, or concerns raised regarding modern slavery in your business or supply chains? If so, please provide details.
- 7.4 Is there a mechanism or whistle-blowing policy to encourage concerns about modern slavery to be raised so that they can be investigated?
- 7.5 Has your business or any of your employees, agents or subcontractors who supply goods or services on your behalf, been investigated or charged in relation to breaches of legislation relating to modern slavery or human rights generally (in Australia or internationally)? If so, please provide details.

## **8. TRAINING**

- 8.1 Has any modern slavery training been provided to your staff or subcontractors? If so, how, when and to whom is training provided?
- 8.2 Is it tailored or further training given to higher risk groups, such as your procurement teams?

## ANNEXURE 1