



MODERN SLAVERY STATEMENT

Foreword

This is the fifth Modern Slavery Statement (**MSS**) made by PointsBet Holdings Limited (**PointsBet Holdings**) pursuant to the *Modern Slavery Act 2018* (Cth) (the **Act**). As per its previous MSS, it contemplates the activities of PointsBet Holdings and the consolidated entity comprising PointsBet Holdings and its subsidiaries (**PointsBet**).

PointsBet is heavily regulated and operates only in online wagering and/or iGaming markets that are subject to licensing requirements and oversight by dedicated gambling regulators. Throughout financial year 2024-25, the political and social climate surrounding Australia's online wagering sector has continued to evolve with debate about regulatory settings intensifying. In that context, PointsBet reaffirms its commitment to ensuring its business practices are consistent with high levels of integrity and ethical standards, including by complying with the Act and other similar obligations related to modern slavery. PointsBet remains committed to identifying and mitigating the potential risks of modern slavery related to its business operations, and assessing its progress towards stated ambitions in prior MSS' made since submission of PointsBet's previous statements.

PointsBet continues to monitor trends in the online wagering and iGaming sector to ensure that it maintains and adopts policies, procedures and processes consistent with global good practices. This is enhanced by recent merger and acquisition (**M&A**) activity between PointsBet and MIXI Inc., a Japanese conglomerate that as at 12 September 2025 owned 66.43% of shares in PointsBet Holdings. This recent M&A activity may change the risk profile and complexity of PointsBet's supply chain and business operations and necessitates a review in calendar year 2026 to ensure that PointsBet is aware and can mitigate any new risks or requirements associated with the M&A activity.

Criterion 1: Identify the reporting entity

PointsBet Holdings is the reporting entity. Its full entity details are:

PointsBet Holdings Limited

ABN 68 621 179 351

155 Cremorne Street

Melbourne, Victoria 3121

Australia.

PointsBet Holdings is a reporting entity under the Act, having met the consolidated revenue threshold in the relevant period (the **Reporting Period**).



PointsBet Holdings makes this MSS in accordance with section 13 of the Act as a single reporting entity, on behalf of the associated entities which, for accounting purposes, it owns or controls.

This MSS addresses all 7 mandatory criteria for reporting as set out in section 16 of the Act. In preparing this MSS, PointsBet has used the Commonwealth Guidance for Reporting Entities and the Modern Slavery Act Supplementary Guidance to help inform and direct its approach.

Criterion 2: Describe the reporting entity's structure, operations and supply chain

2.1. Structure

PointsBet Holdings is incorporated in Australia and is listed on the Australian Securities Exchange. PointsBet Holdings has a registered office in Melbourne, Victoria. As at 30 June 2025, PointsBet Holdings wholly owned and controlled 13 subsidiary entities of which:

- 6 were dormant US entities following the USA Exit which are due to be wound up in the second half of calendar year 2025 (**Dormant USEs**); and
- 7 were active, undertaking the operational and management activities of PointsBet.

Each of the Dormant USEs were formally wound up in September 2025. This winding up of the Dormant DSEs represents a reduction of 6 subsidiary entities since submission of PointsBet's most recent MSS in December 2024. PointsBet entities are now only incorporated in either Australia, Canada or India.

The PointsBet employee base has remained consistent since the most recent MSS at 370 employees worldwide, all of whom are over 18 years of age.

2.2. Operations

PointsBet is an online gambling operator that has developed a scalable cloud-based wagering and iGaming platform through which it offers its clients innovative sports and racing wagering products, as well as online casino products (Ontario, Canada only). PointsBet operates as a licensed operator in fully regulated gambling jurisdictions only.

PointsBet has operations in Australia, Canada and India. Since submission of its most recent MSS, PointsBet has ceased its presence in Ireland. PointsBet employs its own staff directly as a matter of course, with engagement of contractors generally limited and always subject to appropriate contractual terms. PointsBet remains committed to, where possible, consolidating the number of suppliers in its supply chain. This enables PointsBet to easily train staff in its processes and policies; these policies are designed to educate those involved in business operations on the requirements in each jurisdiction in which PointsBet operates, relating to (without limitation) anti-bribery and corruption, whistleblowing, and modern slavery. In the past 12 months, PointsBet has also reviewed and refreshed its employee due diligence processes ensuring that employees are subject to appropriate checks including visa checks, police checks and verification of right to work status, where applicable.

It is noted that the recent M&A activity with MIXI Inc., necessitates that PointsBet complete a further review of its supply chain in context of the Act in 2026 to ensure that any new risks have been identified and appropriately mitigated.



2.3. Supply chain

To advance its operations, PointsBet generally procures the following goods and services (in descending order of total spend percentage for financial year 2025 as calculated at 30 June 2025):

FY25

Cost of sales	48.4%
Marketing expenses	24.3%
Employee benefits expenses	18.0%
Information technology costs	5.0%
Administration expenses	3.4%
Consulting expenses	0.3%
Occupancy expenses	0.4%
Travel and accommodation expenses	0.2%

	Category	Description
Direct Suppliers		
	Information Technology	PointsBet is predominantly a technology company. It procures a range of technology services and solutions to support its core wagering and iGaming services. To support its core business, PointsBet also engages a significant range of marketing and promotional related services. Many of these suppliers are large companies and/or large global brands who also have reporting obligations under the Act or similar legislation.
	Software platforms	
	Payment platforms and merchant service providers	
	ID verification	
	Social media services	
	Content production services	
	Merchandising (predominantly for internal purposes/staff)	
Indirect Suppliers		
	Catering services	PointsBet uses a number of indirect suppliers to support its core business, for example office suppliers, professional services, and utilities.
	Cleaning services	
	Courier services	

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	Security services	Many of these suppliers are large companies and/or large global brands who also have reporting obligations under the Act or similar legislation.
	Office supplies	
	Taxi services	
	Travel and accommodation expenses	
	Real estate and property management	
	Professional services	

PointsBet’s business operations continue to be highly technical and focused on the provision of online services rather than tangible products. As demonstrated above, most of PointsBet’s procurement spend continues to be in highly skilled sectors such as marketing and information technology.

PointsBet’s key suppliers are usually located in Australia, the United States, or Canada, all of which are considered low risk for modern slavery in the Global Slavery Index 2018.

Consistent with its prior MSS, PointsBet’s business operations in India continue to involve primarily the employment of highly skilled staff in IT and technology related roles. PointsBet continues to work selectively with a limited number of suppliers in that jurisdiction that maintain high standards of integrity.

PointsBet continues to limit its procurement of new goods and services to third parties that are reputable and ethical. These third parties are usually bigger participants in their industry with demonstrable commitments to preventing modern slavery in all areas of their business. To limit PointsBet’s exposure to modern slavery risks in its supply chain, PointsBet seeks (where possible) to source goods and services from local suppliers within the same jurisdiction as the contracting subsidiary of PointsBet Holdings or otherwise in low-risk modern slavery jurisdictions.

PointsBet continues to report its focus on corporate social responsibility (CSR). The latest CSR report can be found at <https://investors.pointsbet.com.au/>.

In context of M&A activity since submission of its prior MSS, PointsBet reaffirms its commitment to the development of a comprehensive supply chain map that illustrates the goods and/or services it procures, the geographic location of products and services, and which highlights the risks of modern slavery in connection with those locations.

Criterion 3: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls

PointsBet maintains a limited supply chain consistent with that which is expected for an organisation operating in the online wagering and iGaming sector. Information Technology remains a higher-risk category for PointsBet given supply chains in that sector are internationally dispersed and that it remains a larger category of expenditure for PointsBet.



PointsBet continues to mitigate that risk by making efforts to source Information Technology needs through large reputable suppliers operating in low-risk modern slavery jurisdictions such as Australia and North America. As a result, PointsBet considers it to be a low risk that modern slavery may enter its supply chain through this category of spend.

Recent M&A activity may result in a change to the modern slavery risk profile in PointsBet's extended supply network. To mitigate this risk, PointsBet will conduct a review in 2026 to ensure that its organisational structure does not give rise to unknown modern slavery risks and will (if appropriate) implement additional actions, policies and procedures to mitigate newly identified risks.

Criterion 4: Describe the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks, including due diligence and remediation processes

PointsBet reviews, updates and maintains corporate governance policies, processes and procedures to help it prevent the occurrence of modern slavery in its business operations and supply chain. PointsBet recognises this ongoing commitment is critical to ensuring it maintains high standards of ethical practice.

The PointsBet code of conduct (the **Code of Conduct**) sets the standard of behaviour expected from all employees and applies to all business activities conducted on behalf of PointsBet with suppliers, contractors, customers, shareholders, and employees in Australia and overseas. The Code of Conduct outlines that it is each employee's responsibility to always act ethically and responsibly and encourages employees to report any fraudulent, unethical, or irresponsible behaviour. PointsBet makes all employees aware of their obligations in respect of the Code of Conduct and provides regular training to ensure that all employees remain aware of their obligations and the importance of being vigilant or reporting unethical behaviour or practices. PointsBet will conduct a review of the Code of Conduct in 2026; this is considered appropriate in context of the M&A activity described in this MSS.

The PointsBet Whistleblower Policy continues to provide an avenue through which employees and suppliers of goods or services can anonymously report instances of suspected or actual misconduct without fear of intimidation, disadvantage, or reprisal. Staff are trained in the Whistleblower Policy and are made aware of all ways that such misconduct can be reported including via the anonymous hotline or via management and the legal department. PointsBet thoroughly investigates all reports of misconduct and takes appropriate action as required in each circumstance.

Both the Code of Conduct and the Whistleblower Policy are supported by the Anti-Bribery and Anti-Corruption Policy, and all staff are required to undertake training in relation to the same.

PointsBet will communicate the content of this MSS, and ensure all employees understand the risks of modern slavery in its operations and supply chain, and the importance of reporting identified risks.



Criterion 5: Describe how the reporting entity assesses the effectiveness of these actions

5.1 Management of risks and mitigation strategy

PointsBet conducts due diligence and risk assessments when engaging new material suppliers or renewing existing ones. Where applicable, this includes review of their cyber security and data protection systems and strategies, processes, or evidence of compliance with relevant laws and regulations. This is an effective and proactive way that PointsBet attempts to mitigate the risk of modern slavery in its supply chain, and it is reinforced by always seeking contractual inclusions that obligate material suppliers to comply with applicable laws and regulations such as those which relate to modern slavery.

PointsBet is in the final stages of implementing a new supplier contract initiation, review, negotiation and approval process supported by a third-party platform. This new process replaces the existing one where requests flow to the Legal department generally via email and other ad hoc methods. This new process will help to reduce modern slavery risks in PointsBet's extended supply chain by increasing transparency and ensuring that all new material contractual engagements go through a consistent and auditable drafting, review and negotiation process before being approved and signed. Once fully implemented, a new questionnaire is intended to be incorporated into the review process. The new questionnaire will complement existing processes that exist primarily for supplier engagements in the technology sector. Implementation of the new process and questionnaire represent significant steps forward for PointsBet's ongoing commitment to analysis of modern slavery risks at a contract and supplier level.

Prior to implementation, PointsBet will review the modern slavery questionnaire template referred to in the prior MSS for ongoing fitness for purpose and, if appropriate, make further amends.

If PointsBet identifies a modern slavery risk in its engagement of a supplier, PointsBet will investigate the matter and collaborate with the supplier to determine whether the risk can be mitigated. If the presence of modern slavery is confirmed in a supplier's operations or a risk cannot be mitigated, PointsBet will seek to terminate its contractual and other commercial relationship with that supplier as soon as is possible. The presence of modern slavery has not been identified in the operations of any of PointsBet's suppliers in the time since submission of its last MSS.

Regarding PointsBet employees, PointsBet continues to maintain a range of processes and controls to prevent modern slavery entering its workplace. This includes conducting background and verification checks on all key employees and contractors. PointsBet employees also undergo a comprehensive induction program, including training, and have access to PointsBet's wide range of guidance and policies so that they understand the importance of recognising and addressing unethical behaviour. As noted above, these processes were reviewed and refreshed in 2025 and PointsBet is confident in the appropriateness of those processes to assist in preventing modern slavery from entering its workplace.

5.2 Progress against commitments since reporting commenced for MSS

In each of its prior MSS', PointsBet committed to progressing the following strategies:

Changes / Evolving Risks



PointsBet committed to monitoring changes in its business operations and supply chains to ensure new or evolving risks are identified and addressed appropriately and proportionately. This is an ongoing commitment and, as noted above, will again be a focus in 2026.

Regular Reviews

PointsBet committed to regularly reviewing policies and procedures to ensure they remain effective in combatting all forms of modern slavery.

This objective progressed well in 2025 with particular focus on processes related to employee due diligence and internal audit of key policies and procedures as part of PointsBet's gambling specific regulatory obligations.

Supplier Code of Conduct

PointsBet maintains an ongoing commitment to developing a formal Supplier Code of Conduct & seeking to include clauses in supplier contracts to ensure compliance with applicable laws, including the Act.

PointsBet remains committed to this objective. Introduction of the new supplier contract initiation, review, negotiation and approval process supported by a third-party platform, and later the supplier questionnaire is the next step in this commitment.

Criterion 6: Describe the process of consultation with any entities the reporting entity owns or controls

PointsBet Holdings is making a single statement for the purpose of the Act on behalf of all the entities it owns or controls within the PointsBet group. It is required to consult with these entities in making this MSS. Accordingly, this MSS was prepared with visibility of the business operations and supply chain for all of PointsBet.

PointsBet will review the Act and best practice guidance issued by the Australian Border Force, to assess its consultation process and make any improvements that may be required.

Criterion 7: Provide any other relevant information

PointsBet continues to monitor new and emerging technologies such as artificial intelligence with a view to understanding how they may be used to help prevent and detect the presence of modern slavery risks in business operations and supply chains. PointsBet is aware of the increased use of new and emerging technologies such as artificial intelligence by other industries to detect the presence of modern slavery risks in their business operations and supply chains. PointsBet will continue to monitor these technologies and (if appropriate) take steps to actively consider how they can be implemented to assist PointsBet with its own work in relation to identifying and mitigating modern slavery risks.



This Modern Slavery Statement was approved by the Board of PointsBet Holdings Limited.

A handwritten signature in black ink that reads "Brett Paton".

Signed by Brett Paton

Chairman of the Board

PointsBet Holdings Limited