



MODERN SLAVERY STATEMENT

Introduction

This is the second Modern Slavery Statement (**MSS**) made by PointsBet Holdings Limited (**PointsBet Holdings**) pursuant to the *Modern Slavery Act 2018 (Cth)* (the **Act**). Like our first MSS released in December 2021, it contemplates the activities of PointsBet Holdings and the consolidated entity comprising PointsBet Holdings and its subsidiaries (**PointsBet**).

PointsBet is committed to maintaining the highest levels of integrity and ethical standards in all its business practices and to ensuring compliance with the Act. This MSS both reaffirms PointsBet's commitment to identifying and mitigating the potential risks of modern slavery and assesses the progress made since PointsBet's first MSS.

The wagering industry has evolved significantly in the past twelve (12) months placing even greater emphasis on legal and regulatory compliance. Compliance with all such obligations continues to be at the centre of PointsBet's operations and PointsBet continues to take a zero-tolerance approach to any form of modern slavery.

About PointsBet

Structure

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.

PointsBet Holdings is incorporated in Australia and is listed on the Australian Securities Exchange. Since our first MSS, PointsBet has expanded such that PointsBet Holdings now wholly owns and controls 35 subsidiary entities, which undertake the operational and management activities of PointsBet. All of these entities are incorporated in either Australia, the United States, Canada, Ireland and now India.

Operations

PointsBet operates in Australia, the United States, Canada, Ireland, and India, and employs approximately 652 people, all of whom are over 18 years of age. PointsBet continues to employ its own staff directly where possible which reduces the number of suppliers in its supply chain. This enables PointsBet to train staff in its processes and policies designed to educate those involved in PointsBet's business operations on the requirements in each jurisdiction with which PointsBet operates relating to (without limitation) anti-bribery and corruption, whistleblowing and now, modern slavery.

Supply chains

In order to advance its operations, PointsBet generally procures the following goods and services (in descending order of total spend percentage as calculated at FY22 year-end):

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Marketing expenses	43.2%
Cost of sales	32%
Employee benefits expenses	16.9%
Information technology costs	4.1%
Administration expenses	2.8%
Consulting expenses	0.5%
Occupancy expenses	0.3%
Travel and accommodation expenses	0.2%

PointsBet's business continues 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 information technology, marketing, and professional services.

The vast majority of PointsBet's suppliers continue to be located in Australia, the United States, Canada, and Ireland, all of which were deemed as low risk for modern slavery according to the *Global Slavery Index 2018*. However, PointsBet does procure some outsourced customer service and technology resource services directly from overseas suppliers in the Philippines. PointsBet has written contracts in place with these service providers which cover relevant obligations as they relate to data protection, privacy, and fair and equitable treatment of contractors. Additionally, since our first MSS PointsBet has commenced business operations in India and to mitigate the risks of modern slavery in that jurisdiction, PointsBet will only work with suppliers that maintain the highest possible standards of integrity.

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

In 2021-22, PointsBet was focused on corporate social responsibility (**CSR**) and the compilation of its first report into its commitment regarding CSR issues. The release of that CSR report is PointsBet's steppingstone to reaffirm 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. Development of this supply chain map continues to be a medium-term goal for PointsBet.

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Modern Slavery Risks in PointsBet's Supply Chains and Operations

Due to the nature of its operations, PointsBet has a limited supply chain. Information Technology continues to be assessed as a higher-risk category for PointsBet due to the highly dispersed and global nature of supply chains and because it is PointsBet's largest category of expenditure. However, because PointsBet sources Information Technology predominantly through low-risk modern slavery jurisdictions (e.g., Australia, the USA and Canada), PointsBet remains of the view that the risks of modern slavery practices in its supply chains are low.

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

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

Policies and governance

PointsBet continues to maintain corporate governance policies that assist in ensuring there is no modern slavery in its operations and supply chain, and that PointsBet's reputation and ethical practices are maintained.

PointsBet's Code of Conduct provides a benchmark for professional behaviour expected from all employees, and applies to all business activities with suppliers, contractors, customers, shareholders, and employees in Australia and overseas. The Code of Conduct outlines that it is each employee's responsibility to always act ethically and responsibly and encourages employees to report any fraudulent, unethical, or irresponsible behaviour. PointsBet ensures regular training on the Code of Conduct for employees. Additionally, PointsBet intends to review the Code of Conduct in the 2023 calendar year to ensure that it remains up to date and is effective in combating modern slavery issues.

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

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

Management of risks and mitigation strategy

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

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

PointsBet will continuously assess suppliers in its supply chain to understand potential high-risk areas in relation to modern slavery. Throughout the 2022 calendar year, PointsBet conducted an internal review of its current global procurement processes, procedures, and practices, which review resulted in a number of recommendations that are now being considered. Once those recommendations are fully considered and (where deemed appropriate) implemented, PointsBet will be in a position to recommence implementing a new supplier questionnaire into its new procurement process. This questionnaire will include content designed to assist PointsBet in understanding and mitigating risks of modern slavery occurring in PointsBet's supply chain.

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

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

Progress against commitments in first MSS

In its first MSS, PointsBet committed to progressing the following strategies:

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

Pleasingly, PointsBet has made progress against these commitments. Of note, the internal review of PointsBet's current global procurement processes, practices and procedures has helped PointsBet understand what operational improvements are required to bring it in line with better practice procurement standards. Once implemented, these improvements will help PointsBet better monitor its supply chain against new and evolving risks, ensure that modern slavery risks are adequately addressed in all applicable contracts and that PointsBet is well placed to hold third party suppliers to the highest standards of integrity.

While not naïve to the fact that most of its third-party suppliers are large, reputable multinational companies with their own policies and codes in place, PointsBet continues to envisage that a Supplier Code of Conduct will in the future be an integral part of its arsenal

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in ensuring that it only partners with third parties that are equally committed to stamping out modern slavery in all its forms.

Future commitments

PointsBet remains committed to progressing all of the strategies outlined in its first MSS. In the short to medium term PointsBet hopes to do this by:

- implementing the above-mentioned procurement improvements;
- reviewing the employee Code of Conduct to ensure that it is up to date and effective in combating modern slavery risks; and
- internally auditing progress against PointsBet's modern slavery commitments prior to release of its third MSS.

This Modern Slavery Statement was approved by the Board of PointsBet Holdings Limited on 22 December 2022.



Signed by Brett Paton

Chairman of the Board

PointsBet Holdings Limited