



MODERN SLAVERY STATEMENT

Foreword

This is the fourth 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 submissions, this MSS 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 wagering and/or iGaming markets that are subject to licensing requirements and oversight by dedicated gambling regulators. During the past 12 months, particularly in Australia, public debate about regulatory settings for the industry in which PointsBet operates has been rife and PointsBet anticipates a further tightening. This means it is more important than ever that PointsBet conducts its business practices with high levels of integrity and ethical standards, including by complying with the Act and other similar obligations related to modern slavery. This MSS reaffirms PointsBet's commitment to identifying and mitigating the potential risks of modern slavery related to its business operations, and assesses the progress made since submission of PointsBet's previous statements.

Globally, the wagering and iGaming sector continues to evolve as new regulated markets come online and look to adopt best practices from other jurisdictions; the past 12 months have seen a continued tightening of consumer protection frameworks, placing even greater emphasis on PointsBet's commitment to legal and regulatory compliance as part of its social license to operate. During FY 22-23 PointsBet went through merger and acquisition (**M&A**) activity and completed the sale of its USA business operations, which sale was announced in mid-2022 (the **USA Exit**). This gave PointsBet pause to scrutinise the areas of its business operations that remained post completion of the USA Exit. As a result, it has been assessed that the complexity of PointsBet's supply chain and business operations has reduced significantly with the benefit being clear simplification in PointsBet's risk profile.

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 its 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. PointsBet Holdings wholly owns and controls 13 subsidiary entities of which:

- 6 are dormant US entities following the USA Exit which are due to be wound up in 2025.
- 7 undertake the operational and management activities of PointsBet.

This represents a reduction of 7 subsidiary entities since submission of PointsBet's most recent MSS. PointsBet entities are incorporated in either Australia, the United States, Canada or India, noting that a previously reported entity in Ireland exited the group as part of the USA Exit.

PointsBet has also significantly reduced its employee base since the most recent MSS from 630 to 370 employees worldwide, all of whom are over 18 years of age. This reduction is a direct result of the USA Exit.

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 (Canada only). PointsBet operates as a licensed operator in fully regulated gambling jurisdictions only.

PointsBet has operations in Australia, Canada and India (noting that it has retained an immaterial presence in Ireland). The ongoing process of simplifying the organisational structure as part of the USA Exit and employing its own staff directly where possible, has ensured that PointsBet continues to reduce 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 addition, PointsBet employees are subject to visa checks, police checks and the checking of right to work status, where applicable.

2.3. Supply chain

To advance its operations, PointsBet generally procures the following goods and services (in descending order of total spend percentage as calculated at FY24 year-end):

POINTS BET

EVERY POINT MATTERS

Cost of sales	46.6%
Marketing expenses	28.5%
Employee benefits expenses	17.8%
Information technology costs	3.9%
Administration expenses	2.0%
Consulting expenses	0.4%
Occupancy expenses	0.5%
Travel and accommodation expenses	0.3%

	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.
	Software platforms	
	Payment platforms	Many of these suppliers are large companies and/or large global brands who also have reporting obligations under the Act or similar legislation.
	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	Many of these suppliers are large companies and/or large global brands who also have reporting obligations under the Act or similar legislation.
	Security services	
	Office supplies	
	Taxi services	
	Travel and accommodation expenses	



	Real estate and property management	
	Professional services	

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 marketing and information technology.

The vast majority of PointsBet's suppliers are located in Australia, the United States, or Canada, all of which were deemed as low risk for modern slavery according to the Global Slavery Index 2018.

It is also noted that, since its last MSS, PointsBet has:

- Continued to maintain business operations in India. These business operations primarily relate to the employment of highly skilled staff in product, IT, and technology related roles. PointsBet only works with suppliers in that jurisdiction that maintain the highest possible standards of integrity.
- Consciously decided to exit contracts for outsourced customer service and technology resourcing in the Philippines which has contributed materially to the simplification of its supply chain since the prior MSS.

PointsBet's approach to procurement and contractual relations with third parties continues to be to work with reputable and ethical industry leading organisations that are committed to preventing modern slavery in all areas of 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 Limited or otherwise in low-risk modern slavery jurisdictions.

PointsBet continues its focus on corporate social responsibility (**CSR**) and annually reports about its progress on CSR related issues. The latest CSR report can be found at <https://investors.pointsbet.com.au/>.

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. As part of the USA Exit, PointsBet progressed this commitment by reviewing material suppliers and creating a map of internal relationship management to ensure transparency and simplify relationship / issue management.

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

Due to the nature of its operations, PointsBet has a limited supply chain. As for each prior MSS, Information Technology continues to be assessed as a higher-risk category for PointsBet. This is due to the highly dispersed and global nature of related supply chains and because it is a larger category of expenditure for PointsBet.



That said, PointsBet makes considerable effort to source Information Technology needs through low-risk modern slavery jurisdictions such as Australia and North America, and so PointsBet considers that the risks of modern slavery practices entering its supply chain through this category of spend is low.

PointsBet is attentive to the possibility that extended supply networks in higher risk jurisdictions or categories could be susceptible to modern slavery. PointsBet monitors this and considers that as a result of the USA Exit and accompanying organisational restructure, PointsBet's business operations have experienced an overall decrease in modern slavery risk. PointsBet will conduct a review and reassessment in due course and, if ultimately appropriate, put in place any additional actions, policies, or procedures which may be required to further reduce the risk of modern slavery in its supply chain.

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

From time to time, PointsBet has reviewed, updated, and maintained corporate governance policies to help it prevent the occurrence of modern slavery in its business operations and supply chain. This is vital to ensuring that PointsBet's reputation and ethical practices are maintained.

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 each employee must act ethically and responsibly and it 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. As per its earlier commitment, PointsBet conducted a review of the Code of Conduct in 2023 aimed at ensuring its ongoing relevance and fitness for purpose. Accordingly, PointsBet is confident that the Code of Conduct is up to date, and effective in helping to combat modern slavery issues. A further review of the Code of Conduct was considered for 2024; however, it was ultimately decided that such a review would be more appropriately conducted with greater distance from the USA Exit. PointsBet currently anticipates conducting a further review of the Code of Conduct in 2025, once its post USA Exit operating model is settled.

The PointsBet Whistleblower Policy provides a framework (inclusive of hotline) for employees and suppliers of goods or services to 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 all applicable laws and regulations such as those which relate to modern slavery.

Following compilation of the contracts register referred to in PointsBet's most recent MSS, in the 2024 calendar year PointsBet has commenced a project to develop a technology-based process for supplier contract initiation and review by the legal department. This new process will replace the existing ad hoc process, clarify expectations and requirements (including as regards modern slavery matters) and streamline negotiation. It is intended that the questionnaire (referred to below) will be incorporated into this process. This project represents the next step in PointsBet's ongoing commitment to more deeply analyse modern slavery risks at a contract and supplier level.

PointsBet has developed, but not yet rolled out, a modern slavery questionnaire for new material suppliers to its business operations. Questions are aimed at identifying the supplier's understanding of modern slavery issues / risks in its own business operations and ensuring that PointsBet only takes on new material suppliers which do not materially exacerbate the risk that modern slavery will occur in PointsBet's extended supply chain. PointsBet intends to commence using the questionnaire as part of the implementation of the new contract review and initiation process (referred to above). This progress is considered adequate having regard to the reduction of risk in PointsBet's business operations since the USA Exit and considering the relatively low incidences of taking on new material suppliers since.

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 is not able to be mitigated, PointsBet will seek to terminate its contractual and other commercial relationship with that supplier as soon as is possible. Pleasingly, during the time since the 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 processes and controls in place to prevent modern slavery entering its workplace. This includes conducting background, and verification checks on 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.



5.2 Progress against commitments since reporting commenced for MSS

In its prior MSS submissions, 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 commitment has been an ongoing focus as part of the USA Exit and will continue to be.

Regular Reviews

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

This objective progressed well in both 2023 and 2024 including through review of key policies and procedures as part of PointsBet's gambling specific regulatory obligations and its Internal Audit schedule. Again, this Internal Audit schedule included (among other things) assessment of PointsBet's business operations in key spend categories which are susceptible to modern slavery risks.

Supplier Code of Conduct

PointsBet committed to developing a 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. Given that most of PointsBet's contracting is for technology related products and services (including SaaS) from large global companies or brands, PointsBet's capacity to implement its own standard contractual clauses in material contracts has been impaired. To combat this, PointsBet tries to facilitate collaborative relationships with material suppliers and seek inclusion of broad obligations in all contracts that can be used to mitigate modern slavery risks. Releasing the supplier questionnaire discussed above is considered the next step in this commitment with the information gleaned to be analysed and used in development of a new Supplier Code of Conduct.

Increase Auditing of External Parties

PointsBet committed to an increase in auditing of third party suppliers. In general terms, PointsBet has made gains in its supplier relationship management capacity. This includes ensuring that appropriate due diligence is conducted on suppliers and where risks are identified (including without limitation in respect of modern slavery) appropriate action is taken. In particular, supplier risk management was a contributing factor to the cessation of PointsBet's outsourced services contracts in the Philippines.

Given that most of its third party suppliers are large, reputable multinational companies with their own policies and codes in place, PointsBet is comfortable that the progress towards meeting this commitment is appropriate having regard to the level of risk.



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 is aware of the increased use of new and emerging technologies such 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 on 18 December 2024.

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

Signed by Brett Paton

Chairman of the Board

PointsBet Holdings Limited