

Tabcorp

MODERN SLAVERY STATEMENT 2021

ACKNOWLEDGEMENT OF COUNTRY

Tabcorp acknowledges Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of the land on which we live. We pay our respects to Elders past, present and emerging.

INTRODUCTION

This Modern Slavery Statement covers the activities of Tabcorp Holdings Limited (ABN 66 063 780 709) and the consolidated entity comprising Tabcorp and its subsidiaries (“**Group**” or “**Tabcorp**”) and the Group’s interests in joint arrangements and associates in respect of the financial year ended 30 June 2021 (“**FY21**”) in identifying and addressing the potential risk of modern slavery and human trafficking in our operations and supply chain.

Refer to page 12 for the list of Tabcorp entities that are considered reporting entities under the *Modern Slavery Act 2018 (Cth)*. This Statement is made on behalf of these reporting entities as well as all other controlled entities of Tabcorp Holdings Limited.

CEO MESSAGE



David Attenborough
Managing Director and
Chief Executive Officer

I’m pleased to present Tabcorp’s Modern Slavery Statement in respect of FY21.

Our purpose of ***Excitement with Integrity*** underpins everything we do at Tabcorp. We act with integrity and are committed to creating value for our stakeholders in a responsible and sustainable manner.

We’re committed to ethical, sustainable and socially responsible procurement to ensure that the partners we work with make fair, responsible and ethical decisions.

In FY21 the COVID-19 pandemic continued to disrupt our way of life and challenge our business operations and supply chain. During this time, our priority has been ensuring the safety and wellbeing of our people and supporting our partners and the community.

Notwithstanding the challenges of the ongoing pandemic, in FY21 Tabcorp made a number of enhancements to our procurement processes and policies to ensure that potential modern slavery risks in our operations and supply chain are identified and addressed.

Tabcorp also formalised its commitment to upholding human rights by launching our Human Rights Policy. We believe it is our responsibility to respect human rights and we expect our suppliers to uphold human rights and integrate appropriate labour and human rights policies and practices into their business operations.

We will continue to make it a priority to address modern slavery risks in our operations and supply chain.

A handwritten signature in black ink, appearing to read 'David R H Attenborough'. The signature is stylized and cursive.

David R H Attenborough
Managing Director and
Chief Executive Officer
9 December 2021

ABOUT TABCORP

Tabcorp is a world-class gambling entertainment group, listed on the Australian Securities Exchange with a market capitalisation of approximately \$11.5 billion at 30 June 2021.

Tabcorp has national reach through retail partnerships with over over 9,000 venues, the largest retail footprint of any company in Australia, in addition to digital channels.

Tabcorp's retail network comprises business partnerships with venues that sell lotteries, Keno and wagering products. This includes TAB agents, hotels, clubs and newsagents.

Tabcorp employs over 4,000 people across our operations.

We operate three market leading businesses:

Lotteries and Keno

The Lott is Australia's leading official licensed lottery business with operations in NSW, Victoria, Queensland, South Australia, Tasmania, ACT and Northern Territory.

Keno is a social lottery-style game that is played in licensed clubs, hotel and TABs in certain Australian states and territories.



Wagering and Media

TAB is a leading omni-channel wagering operator in Australia, providing betting experiences across digital channels and in retail (on-course in licensed venues and agencies) in NSW, Victoria, Queensland, South Australia, Tasmania, ACT and Northern Territory.

Sky Racing is a multi-channel racing and sports broadcaster in Australia.

Our international operations comprise an Isle of Man based international wagering pooling hub (Premier Gateway International) and the US based vision and distribution hub and licensed tote provider (Sky Racing World).



Gaming Services

MAX is Australia's largest gaming services provider, offering a wide range of services, including electronic gaming machine ("EGM") monitoring and related services, EGM financing and maintenance, and solutions and other value-added services.

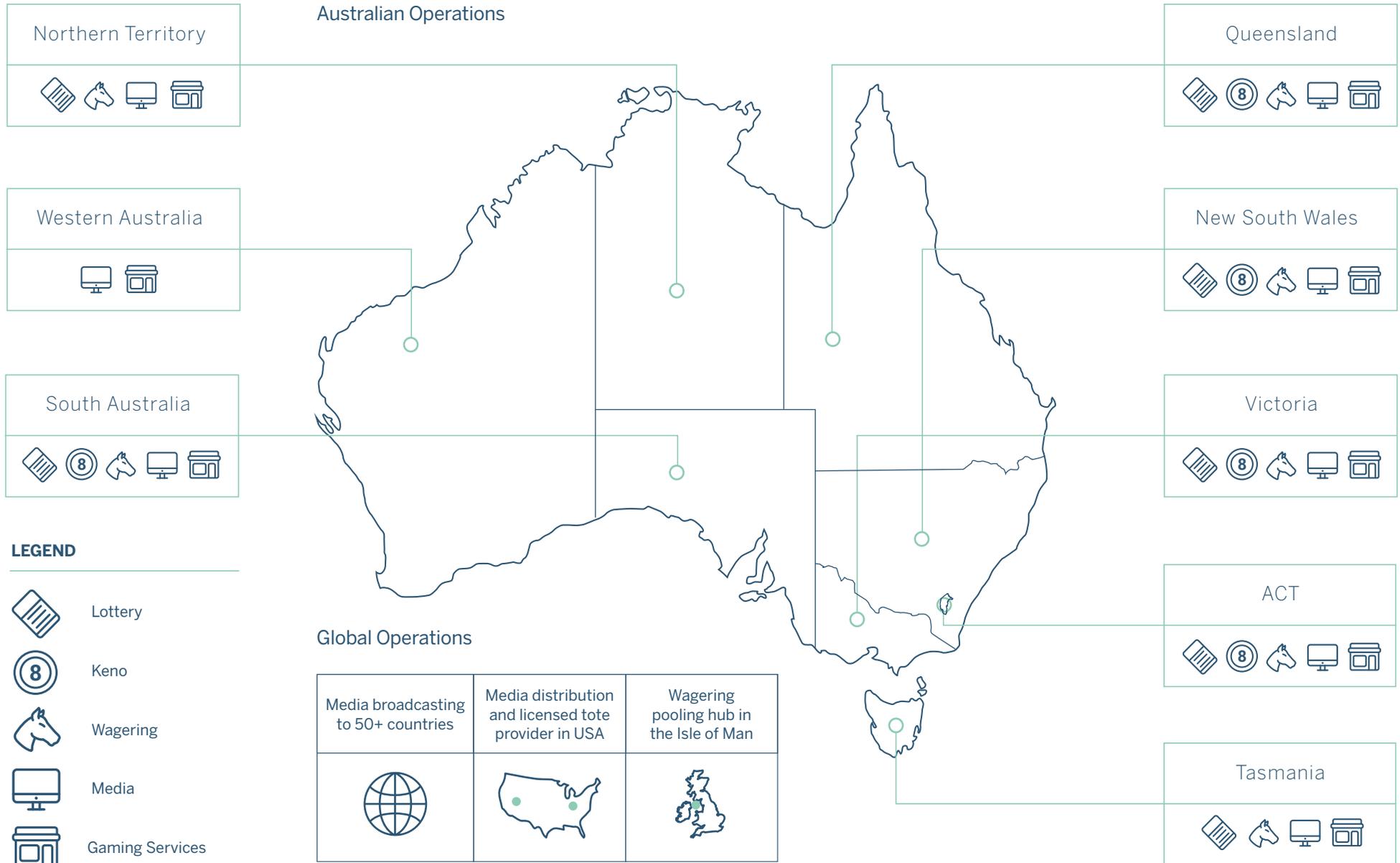


In FY21, Tabcorp reported revenues of \$5.7 billion and a net profit after tax of \$269 million. Tabcorp's businesses generated \$4.9 billion of total benefits for our stakeholders in FY21, which comprised State and Federal Government taxes, employee costs, shareholder dividends, payments to racing industry bodies and commissions paid to our retail partners.

For more information about Tabcorp's business operations and strategy please refer to our **2021 Annual Report** available at www.tabcorp.com.au.

ABOUT TABCORP CONTINUED

Australian Operations



LEGEND

-  Lottery
-  Keno
-  Wagering
-  Media
-  Gaming Services

Global Operations

Media broadcasting to 50+ countries	Media distribution and licensed tote provider in USA	Wagering pooling hub in the Isle of Man
		

FY21 DEVELOPMENTS

Key developments since the beginning of the reporting period include:

- Launched Tabcorp’s Human Rights Policy.
- Established a cross-functional Steering Committee comprising key representatives from the business to oversee Tabcorp’s modern slavery risk management, labour and human rights policies and practices.
- Developed and incorporated training on our modern slavery and human rights policies and practices into our induction program for all new starters.
- Reviewed and enhanced policies relating to modern slavery, including our procurement policy, to ensure they uphold our commitments to modern slavery and human rights and align with market practice.

- Incorporated modern slavery and human rights due diligence into the standardised processes and templates for Tabcorp’s procurement processes.
- Conducted supplier risk assessments, supplier segmentation analysis and profiling to identify country of origin and demographics of suppliers, size of spend and category of the goods/services.
- Enhanced pre-screening supplier activities including modern slavery related questions which have been added to our procurement tendering templates.
- Introduced key performance indicators for our Procurement team members for modern slavery, sustainability and mandatory training.

PROPOSED DEMERGER

Tabcorp has announced its intention to undertake a demerger of its Lotteries and Keno business (“**Demerger**”) following the conclusion of a strategic review of structural and ownership options to maximise value for shareholders. The proposed Demerger will create two standalone, market leading ASX-listed companies with distinct operating profiles, strategies and growth opportunities.

The proposed Demerger is subject to shareholder, court, regulatory and other stakeholder approvals and is targeted for completion by June 2022. For further information refer to Tabcorp’s ASX announcements of 5 July 2021, 18 August 2021 and 19 October 2021.

GOVERNANCE AND POLICY FRAMEWORK

Tabcorp is committed to good corporate governance and to maintaining leading corporate governance practices which help us meet or exceed the requirements of applicable legislation and corporate governance standards. Our corporate governance arrangements are core to our vision to be **The Trusted Gambling Entertainment Company** and to building on our purpose of delivering **Excitement with Integrity**.

Tabcorp’s corporate governance framework applicable in FY21 is summarised in the diagram below. Tabcorp’s corporate governance arrangements are

regularly reviewed and revised as appropriate to reflect Tabcorp’s evolving needs, changes in law and developments in corporate governance practices.

For more information about Tabcorp’s corporate governance framework, practices and policies please refer to our **2021 Corporate Governance Statement** available at www.tabcorp.com.au.

Tabcorp has a number of policies in place that support our governance framework to address modern slavery in our operations and supply chain. These policies are set out on the following pages.



GOVERNANCE AND POLICY FRAMEWORK CONTINUED

Tabcorp Code of Conduct

Tabcorp's Code of Conduct is founded upon Tabcorp's values and sets out the standards of behaviour that are expected of all employees, Directors and contractors.

The Code of Conduct is one of the ways we put Tabcorp's integrity and values into practice. It is built around the recognition that everything we do in connection with our work at Tabcorp should be measured against the highest standards of ethical business conduct.

The Code of Conduct defines the expected standards of behaviour at Tabcorp across eleven guiding principles including acting ethically and with integrity, treating people with dignity and respect and calling out dishonest and unethical behaviour. It includes practical guidance for employees about how to access support and make an official report if they experience or witness behaviour not aligned with the Code.

The Board oversees and approves material changes to the Code. The Executive Leadership Team and senior managers are responsible for instilling and reinforcing Tabcorp's values, the Code and Group policies. The Code and key policies are communicated to employees and made available to new starters. Training and awareness of the Code and key policies are provided to employees, and changes are communicated when required. Material breaches of the Code and key policies are reported to the Board or relevant Committee as appropriate.

 Do it as One Team	 Do the Right Thing	 Explore What's Possible	 Create Awesome Moments	 Make a Difference
We are stronger together. We are inclusive, collaborative and know that amazing ideas can come from anywhere	We always act with integrity, standing up (and speaking out) for what's right	We listen. We think big. We ask 'what if'. Our curiosity for what's next will shape tomorrow	We all have the power to delight and inspire, so let's dial up the excitement and create awesome moments	We're passionate and proud about making a real change for customers, and benefiting our communities

GOVERNANCE AND POLICY FRAMEWORK CONTINUED

Supplier Code of Conduct

The Supplier Code of Conduct is one of the ways in which Tabcorp ensures that we work with partners that make fair, responsible and ethical decisions.

The Supplier Code of Conduct outlines the expectations we have of our suppliers across six areas:

- Integrity, ethics and corporate conduct;
- Corporate governance;
- Labour and human rights;
- Privacy and cyber security;
- Health, safety and wellbeing; and
- Environmental management.

Tabcorp's approach is to work collaboratively with our suppliers to meet and exceed the expectations set out in this Code. We expect our suppliers to assess their compliance with this Code and report on any deficiencies or breaches. We may require suppliers to provide evidence of their compliance with this Code and we may conduct independent audits of compliance.

We also expect our suppliers to monitor their suppliers' compliance with Tabcorp's Supplier Code of Conduct and ensure timely remediation of any non-compliance. Suppliers are required to notify us if they become aware of an actual breach or reasonable likelihood of breaching the Code.

Human Rights Policy

At Tabcorp, we believe that human rights are universal and fundamental rights that preserve the inherent freedom, dignity and equality of all human beings.

In FY21, Tabcorp launched its Human Rights Policy which formalises our commitment to respecting the rights of the people we interact with and are impacted by our business operations and relationships. Tabcorp's Human Rights Policy complies with the guidelines for companies set out in the *UN Guiding Principles on Business and Human Rights*. Tabcorp is committed to respecting and upholding the internationally recognised human rights set out in the *International Bill of Human Rights*, the *International Labour Organisation's Declaration on Fundamental Principles and Rights at Work* and the *United Nations Declaration on the Rights of Indigenous Peoples*.

We expect our suppliers to uphold human rights and integrate appropriate labour and human rights policies and practices into their business operations.

Through this policy, Tabcorp commits to:

- Undertake human rights due diligence, risk assessment and monitoring processes to understand, assess and address potential human rights violations associated with our own operations and the activities of our business partners and suppliers;
- Regularly communicate our expectation to respect human rights to team members, business partners and suppliers and include this in relevant training programs;
- Establish confidential reporting processes for those wishing to report human rights related concerns and, where appropriate, seek remedy; and
- Undertake annual public reporting on our legal, regulatory and voluntary human rights commitments.

Whistleblower Policy

Consistent with our commitment to maintaining a culture of honesty and integrity, Tabcorp has a Whistleblower Policy and framework in place to respond to any reports of actual or suspected misconduct within Tabcorp and to protect whistleblowers from detrimental conduct and breaches of their confidentiality. This policy applies to Tabcorp's current and former employees, Directors, contractors and suppliers, including employees of contractors and suppliers.

Matters are reported through the Tabcorp Integrity Protection Service ("**TIPS**"), an independent, anonymous and secure service delivered by Deloitte, or to any of a number of Whistleblower Report Officers. The whistleblower program is overseen by an Internal Whistleblower Committee, which has accountability and a direct reporting line to the Board Audit Committee. The Chairman of the Audit Committee, and where necessary or appropriate, the Chairman of the Board, is able to securely access whistleblower reports and review the action taken. The Whistleblower Policy is regularly communicated to all employees to raise awareness of the policy and explain key features such as how to make a whistleblower report and the protections available to whistleblowers.

Inclusion and Diversity Policy

Tabcorp's Inclusion and Diversity Policy sets out our commitment to a culture of inclusion and the creation of a bias-free workplace where all are welcomed and respected. The People and Remuneration Committee is responsible for overseeing the policy, monitoring Tabcorp's inclusion and diversity strategy and reviewing progress against its objectives.

Workplace Health, Safety and Wellbeing Policy

Tabcorp is committed to providing a safe environment for employees, contractors and visitors, and actively promotes health, safety and wellbeing in the workplace. Through our Health, Safety and Wellbeing Policy we are committed to eliminating or reducing health and safety risks, demonstrating leadership in, and commitment to, all areas of health, safety and wellbeing and fostering a culture of wellbeing by providing resources that reinforce healthy lifestyle choices.

STAKEHOLDER ENGAGEMENT

Tabcorp engages with a number of stakeholders in addressing modern slavery risks.

Tabcorp conducts vendor governance meetings with strategic, tier one suppliers on a monthly or quarterly basis. All relevant risks, including modern slavery, are addressed in these meetings.

Tabcorp regularly engages with industry partners and associations across lotteries and wagering regarding our Fair Work Compliance program in order to provide holistic guidance and support to our retail partners in the administration of their employment obligations.

Tabcorp is a member of the Certified Institute of Procurement Specialists and the Fintel Alliance, the Australian Transaction Reports and Analysis Centre's ("**AUSTRAC**") public-private partnership that combines the expertise and skills of Federal and State Government intelligence and law enforcement agencies and private sector businesses to protect the Australian financial system and community from criminal abuse.

RISK MANAGEMENT

Tabcorp's Risk Management Framework, policies and procedures set out the roles, responsibilities and guidelines for managing financial, operational and other risks associated with our business, including human rights and modern slavery risks. The Framework enables the identification, evaluation, monitoring, management, reporting and oversight of risk throughout the Group.

Human rights and modern slavery risk identification and management information is reported to the Executive Leadership Team and the Board Risk and Compliance Committee. Senior managers in Tabcorp's Procurement, People and Culture and Legal functions have accountability for managing these risks.

In FY21, Tabcorp established a cross-functional Modern Slavery and Human Rights Working Group comprising senior managers from Procurement, Risk, Legal, Corporate Responsibility, Governance and People and Culture. This Working Group oversees the company's identification, management, mitigation, remediation (where necessary) and disclosure of modern slavery and human rights risks.

TABCORP'S OPERATIONS

Tabcorp employs or engages over 4,000 people, over a third of which are casual or contracted employees. We are committed to complying with all applicable laws and regulations with respect to wages, working hours, leave entitlements, superannuation and workers' compensation insurance. We undertake an annual minimum wage review across all our operations to ensure that Tabcorp employees are compensated fairly and in accordance with relevant awards or enterprise agreements, where applicable.

Tabcorp has reviewed its operations regarding our provision of labour to other organisations and has assessed and taken steps to address any potential risks.

Fair Work Retail Compliance Program

Tabcorp sells its lotteries and wagering products through a network of lotteries franchisees and wagering agents across Australia.

We have undertaken significant work to protect vulnerable workers and prevent potential contraventions of the *Fair Work Amendment (Protecting Vulnerable Workers) Act 2017* in our retail networks. In 2018, we developed and implemented a program to ensure our lotteries franchisees and wagering agents comply with the Act regarding minimum rates of pay, awards and enterprise agreements. The program comprises four steps: set expectations; educate and train; monitor compliance; and take further action.

STEP ONE: Set expectations

Tabcorp conducts comprehensive due diligence and onboarding of our retail partners. The terms of our contractual agreements with retail partners specify the requirement to comply with workplace laws and Tabcorp's right to audit and access records where required. We ensure our Operations Manual and other written commitments detail our expectations to comply with workplace laws.

STEP TWO: Educate and train

Tabcorp ensures our retail partners are aware of obligations and consequences of non-compliance with workplace laws through targeted in-house and publicly available training offerings, templates, guidance materials and other resources. Tabcorp trains our business development managers to ensure they are aware of our partners' workplace obligations and Tabcorp's role in upholding them. Tabcorp also publishes a quarterly series of educational communications to our retail network on key obligations and to raise awareness of trends identified through our monitoring activities.

STEP THREE: Monitor compliance

Tabcorp requires our retail partners to complete online self-audits on the key obligations required by them as employers. We also undertake annual site surveys in venue which requires the retail partner or an employee to answer a series of brief questions to enable Tabcorp to capture potential non-compliance or information gaps. Tabcorp has established a dedicated Retail Workers Hotline, managed independently by Deloitte, to enable the employees of Tabcorp's retail partners to anonymously report suspected non-compliance or concerns regarding their workplace entitlements.

STEP FOUR: Take further action

Tabcorp has developed a process and governance around responses to known or suspected non-compliance in our retail network. Our approach is to work collaboratively with retail partners to ensure they comply with their obligations. In the event Tabcorp does not believe a satisfactory resolution has been reached, we may suspend or terminate an agreement with a retail partner.

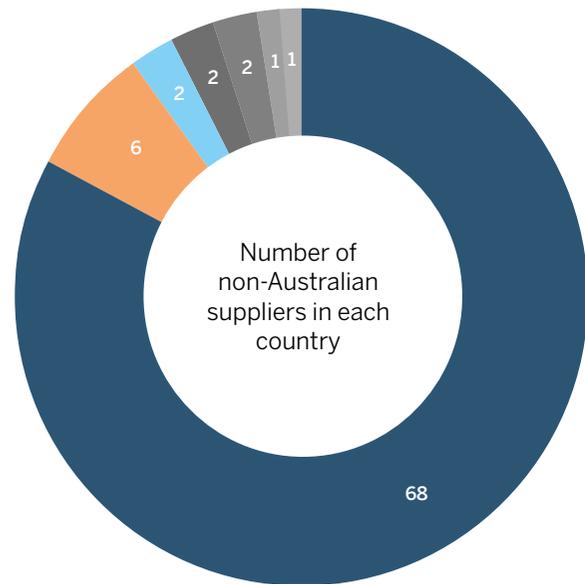
TABCORP'S OPERATIONS CONTINUED

TABCORP'S SUPPLY CHAIN

In FY21, Tabcorp engaged directly with over 1,823 suppliers and contractors. Approximately 68% of Tabcorp's FY21 total spend was with 50 suppliers. Our largest category of spend was information and communication technology at 30%. This includes items used to develop and manage our systems, hardware and software purchases and purchases within our gaming business. The remaining 70% of procurement spend was on activities including property, recruitment and professional services, travel and consumables.

Only 4% of total FY21 spend was with 82 international suppliers and 94% of this spend was with suppliers based in countries deemed as low risk for modern slavery according to the *Global Slavery Index*.

Tabcorp's non-Australian suppliers by location



Key

- United States
- France
- Singapore
- United Kingdom
- Canada
- Japan
- Switzerland

Supplier risk management and due diligence

Tabcorp has a centralised process for supplier pre-qualification, onboarding, contracting, monitoring and relationship management. Due diligence and risk assessments are undertaken as part of pre-qualification for all potential suppliers. This process includes assessment for anti-money laundering, sanctions lists, adverse media monitoring and labour license status.

As part of the onboarding process, Tabcorp expects all its suppliers to assess their compliance with the Tabcorp Supplier Code of Conduct and report on any deficiencies or breaches. We may require suppliers to provide evidence of their compliance with the Code and we may conduct independent audits of compliance.

Tabcorp has included clauses in our supplier contracts to ensure compliance with applicable laws relating to modern slavery and human rights, including the *Modern Slavery Act 2018 (Cth)*.

Suppliers that represent high business impact and/or value to Tabcorp are managed by dedicated specialists in our Procurement team. The team meets at least quarterly with these suppliers to ensure the success of our business relationship. All relevant risks, including modern slavery, are addressed in these meetings.

TABCORP'S OPERATIONS CONTINUED

Modern slavery risk in the supply chain

Tabcorp has assessed the maturity of our existing policies, systems and controls and remediation mechanisms to identify and manage modern slavery risks. Following this, we developed a multi-year plan to manage our ongoing modern slavery response.

We have also undertaken risk mapping of our supply chain to identify priority risk areas where there may be a higher risk of modern slavery practices. In undertaking this risk profiling we considered:

- The category of the product or service being procured;
- The geographic location of the supplier;
- High risk business models; and
- Suppliers that engage or employ vulnerable people.

We have identified Tabcorp's key risk areas within our supply chain as the procurement of information technology computer and electronic equipment, facilities management and labour hire arrangements. Information technology is our largest category of spend and is predominately sourced through Australian based suppliers. We have improved our existing risk management and remediation frameworks where required to mitigate these risks.

As part of Tabcorp's supplier governance framework, we regularly engage with suppliers in these priority risk areas and expect them to take action toward meeting or exceeding the modern slavery and human rights requirements outlined in our Supplier Code of Conduct.

Labour hire

Tabcorp has risk management processes in place to ensure we are compliant with State Government labour hire licencing schemes in the Australian Capital Territory, Queensland, Victoria and South Australia. These schemes are designed to bring integrity and scrutiny to the labour hire sector and ensure vulnerable workers are kept safe from exploitation and being underpaid. Under these laws, Tabcorp must ensure that we only procure designated labour hire services from licenced providers. Labour hire licences are granted by State-based authorities in accordance with legislative criteria, which includes a 'fit and proper person' test and regular reporting obligations.

Tabcorp is continually assessing our supply chain to confirm that all relevant suppliers hold an appropriate labour hire licence. To ensure relevant new suppliers are appropriately licenced before we engage them, our supplier due diligence process includes labour hire assessment questions, and supplier terms include obligations to maintain appropriate licences.

Remediation

Tabcorp's approach is to work collaboratively with our suppliers to ensure they meet our expectations regarding modern slavery and human rights standards. If Tabcorp were to identify a modern slavery risk with a supplier, we would seek further information from the supplier and collaborate to resolve the situation. We did not find any instances of modern slavery in the supplier assessments undertaken this year.

FUTURE PRIORITIES

Going forward, and in the context of the proposed Demerger, Tabcorp will progress the following initiatives:

- Incorporate modern slavery and human rights into Code of Conduct training which is undertaken by all Tabcorp employees and contractors annually; and
- Uplift our supplier due diligence capabilities by implementing new technology that will enhance the supplier risk assessment process.

REPORTING ENTITIES

The following Tabcorp entities are considered reporting entities under the *Modern Slavery Act 2018 (Cth)* in respect of FY21 and are covered by this Statement:

Tabcorp Holdings Limited
Tabcorp Gaming Holdings Pty Ltd
Tabcorp Wagering (Vic) Pty Ltd
Tabcorp Assets Pty Ltd
Tabcorp Finance Pty Ltd
Tabcorp International Pty Ltd
Tabcorp Wagering Participant (Vic) Pty Ltd
Tab Limited
Tabcorp International No. 4 Pty Ltd
Keno (Qld) Pty Ltd
Sky Channel Pty Ltd
Tatts Group Limited
Tattersall's Holdings Pty Ltd
Tattersall's Sweeps Pty Ltd
New South Wales Lotteries Corporation Pty Ltd
Golden Casket Lottery Corporation Limited
Tatts Lotteries SA Pty Ltd
Ubet QLD Limited
Ubet SA Pty Ltd
Maxgaming Holdings Pty Ltd

CONSULTATION AND APPROVAL PROCESS

All Tabcorp entities operate under a common set of governance and risk management policies and programs. This includes the policies and programs through which modern slavery and human rights risks in our own operations and our supply chains are assessed and addressed by Tabcorp.

A process of consultation across Tabcorp and its reporting entities helped to guide the preparation of this Statement. This included engagement with members of senior management heading every relevant function within Tabcorp, the Executive Leadership Team and the Directors of the reporting entities.

This Statement has been approved by the Board of Tabcorp Holdings Limited.

WWW.TABCORP.COM.AU