



## MODERN SLAVERY STATEMENT

### Introduction

This Modern Slavery Statement (“MSS”) is made by betr Entertainment Limited (“betr”) pursuant to section 13 of the Commonwealth Modern Slavery Act 2018 (“the Act”). betr is a digital wagering and entertainment operator operating exclusively in the Australian market. In recent years it has merged with the BlueBet and TopSport brands and migrated all operations to a unified technology platform and management team. betr operates in a highly controlled and regulated environment which has a recently heightened focus on consumer protection and regulatory compliance.

betr is committed to:

- developing strong and lasting relationships with its customers and suppliers;
- mitigating any risks associated with the procurement of goods or services from suppliers; and
- making decisions in an accountable, ethical and transparent manner.

These values underpin what the betr stands for in our procurement and supply chain practices, and guide how we engage with suppliers and partners.

betr recognises that modern slavery and human trafficking are complex, global issues that demand ongoing vigilance and continuous improvement. Over time, we have implemented a policy framework designed to integrate risk awareness and mitigation into our operations and supply chains.

Our corporate values, together with relevant Commonwealth guidance and international best practice principles, inform our ongoing efforts to refine, mature and scale our modern slavery compliance framework. We will continue to monitor all applicable developments and evolve our approach accordingly.

betr is committed to upholding the purpose and requirements of the Modern Slavery Act. As a market leading business, we recognise our responsibility in helping drive systemic progress to prevent and address modern slavery in Australian and global supply chains.

### Criterion 1: Identify the reporting entity

betr is the reporting entity under the Act, having met the consolidated revenue threshold in the relevant period. betr’s full entity details are:

*betr Entertainment Limited*

*ACN 647 124 641*

*Level 9, 8 Spring St Sydney*

*NSW 2000*

*Australia.*

betr 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 seven mandatory criteria for reporting as set out in section 16 of the Act. In

preparing this MSS betr has used the *Commonwealth Guidance for Reporting Entities* and the *Modern Slavery Act Supplementary Guidance* to help inform and direct its approach.

betr is committed to maintaining the highest levels of integrity and ethical standards in all its business practices and ensuring compliance with the Act. betr takes a zero-tolerance approach to any form of modern slavery.

## **Criterion 2: Describe the reporting entity's structure, operations and supply chains**

### **Structure:**

betr is an Australian incorporated company headquartered in Sydney, Australia. It is listed on the Australian Securities Exchange (ASX:BBT) and operates four subsidiary entities. Three of those subsidiaries are dormant. betr has offices in Melbourne, Sydney, Gold Coast and Darwin and a staff of 155.

During FY 2024–25, betr undertook strategic corporate activity, including M&A activity and the completion of its exit from the US. These activities prompted a comprehensive review of betr's operational footprint, corporate governance and supply chain structure. As a result, betr's business operations have been consolidated and streamlined, which in turn has led to a narrow and simplified supply chain and created a strong foundation for a low modern slavery risk profile.

### **Operations:**

betr is a licenced online wagering operator that takes bets on racing and sports products. It operates a proprietary digital wagering platform with exclusively Australian based customers. Its operations include:

- Betting transactions – its customers place bets and make deposits and withdrawals through its website, app and by telephone.
- Product and software development for its wagering platform.
- Customer service and support – a range of account and technical support is offered to betr customers. This is conducted primarily from its Darwin office either online or by telephone.
- Safer gambling – betr provides its customers with a range of safer gambling tools and has an active monitoring system to comply with its safer gambling standards and external Safer Gambling Codes of Conduct.
- Corporate functions (i.e. finance, legal, HR)

All betr employees are subject to visa checks, police checks and a right to work status screening, where applicable.

### **Supply Chain:**

betr's supply chains primarily involve:

- Technology and software vendors (including cloud hosting, payment systems, product feeds and cybersecurity).
- Marketing/media agencies and affiliates.
- Professional services (legal, audit, consulting).
- Office and facilities management (cleaning, IT hardware, consumables).

betr procures the following goods and services (in descending order of total spend percentage as calculated at FY25 year-end):

Cost of sales	58.62%
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Labour expenses	16.95%
Marketing expenses	14.86%
IT & Technology expenses	4.34%
Occupancy expenses (rent & utilities)	1.87%
Travel expenses (international & domestic)	0.64%
Professional service expenses (consulting, accounting & legal)	0.57%
Office expenses (general office & cleaning)	0.05%

Category	Description
<b>Direct Suppliers</b>	
Information Technology	betr is predominantly a technology company. It procures a range of technology services and solutions to support its core wagering 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 reciprocal legislation.
ID verification	
Social media services	
Content production services	
Merchandising (predominantly for internal purposes/staff)	
<b>Indirect Suppliers</b>	
Catering services	betr 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 reciprocal legislation.
Office supplies	
Transport services	
Travel and accommodation expenses	
Real estate and property management	
Professional services	

betr’s business is highly technical and specialized in the provision of online services rather than tangible products. As demonstrated above, most of betr’s procurement spend is in skilled sectors such as marketing and information technology. The majority of suppliers are based in Australia, which is deemed a low risk for modern slavery according to the Walk Free Foundation Global Slavery Index 2025. betr does however have some marketing vendors operating globally in Singapore, Greece, Israel, Malta, Latvia, India, Hong Kong and UAE.

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

betr makes considerable effort to source the vast majority of its third-party providers from Australia or other countries which have a low risk of modern slavery practices and considers that the risks of modern slavery practices entering its supply chain is low. betr recognises that modern slavery risks may exist in the following areas of its supply chain:

Supply chain element	Sectors/product risks	Supply chain model risks	Geographic risks	Modern slavery policies/statements?
<b>Marketer affiliates</b>	-Customer acquisition and targeting services -Digital marketing products and services	Some affiliates appear to outsource, engage with other suppliers to form partnerships or offer fully remote employment positions.	Suppliers located in India and the UAE	Majority are smaller scale operations with limited open-source information available pertaining to modern slavery practices/mitigants
<b>Technology suppliers</b>	-Professional services -Software as a service products - Hardware/infrastructure/net works -Security services and products	Vast supply chains spanning across thousands of suppliers providing goods and services.	Suppliers are global scale technology business and have a footprint across many countries, including higher risk modern slavery jurisdictions	All our key technology suppliers have either modern slavery or human rights statements and supporting policies/processes

betr is alert to the possibility that extended supply networks in this higher risk area could be susceptible to the risk of modern slavery due to the services being dispersed without betr’s authority and because it is a larger category of expenditure for the business. That being said, the nature of the work conducted for betr in such areas, being highly skilled, is not of a high-risk variety in the sense of modern slavery.

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

While we are committed to meeting our obligations under the Modern Slavery Act, we acknowledge that betr is in the early stages of developing and implementing its modern slavery compliance program. During this initial phase, key stakeholders from relevant betr teams have undertaken a high-level risk assessment of our operations and supply chains. This assessment has enabled us to identify areas where the risk of modern slavery is more pronounced (e.g. where a supplier is in a high-risk jurisdiction) and to prioritise specific suppliers and categories of spend based on the *Australian Government’s Guidance for Reporting Entities* and recognised modern slavery risk indicators.

betr has reviewed, updated, and maintained corporate governance policies to maintain best practice and help it prevent the occurrence of modern slavery in its business operations and supply chain.

betr’s Code of Conduct (“Code”), updated in August 2025, sets the standard of behaviour expected from all employees and applies to all business activities conducted on behalf of betr with suppliers, contractors, customers, shareholders, and employees both in Australia and internationally. The

Code outlines each employee's responsibility to act ethically, responsibly, and with integrity at all times, and encourages the reporting of any fraudulent, unethical, or irresponsible behaviour. betr ensures that all employees are made aware of their obligations under the Code and provides training to reinforce its principles and the importance of vigilance in identifying and reporting misconduct. After the recent review of the Code during this reporting period betr is content that the Code is current and fit for purpose.

Additionally, betr has a Whistleblower Policy, which provides a framework for all employees and suppliers to anonymously report instances of suspected or actual misconduct without fear of repercussion. Staff are trained in the Whistleblower Policy and are made aware of all ways that such misconduct can be reported. All reports of misconduct are investigated in accordance with the policy guidelines and appropriate action is taken as required in each circumstance.

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

In addition to a review and update to its corporate policies during the reporting period, betr is committed to continuing further reviews (and updates where deemed necessary) to formal corporate governance policies to specifically introduce guidance to prevent the occurrence of modern slavery in its business operations and supply chain. This is vital to ensuring betr's reputation and ethical practices are maintained.

betr will ensure all employees are informed and understand the risks of modern slavery in the company's operations and supply chain and the importance of reporting identified risks.

betr has also identified the following measures for implementation across the betr Group over the next three reporting periods:

- Development of an Anti-Modern Slavery Policy to clearly articulate our commitment to combatting modern slavery, set expectations for staff, and establish a formal mechanism for raising concerns;
- Inclusion of modern slavery clauses in new supplier contracts and in existing contracts during their renewal (for all pre-existing suppliers), where applicable; and
- Development of a modern slavery questionnaire (Annexure B), to be sent to high-risk suppliers and used for the purpose of conducting a risk review of each supplier.

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

To assess the effectiveness of its actions, betr has:

- Established a compliance working group to oversee modern slavery risk management
- Set Key Performance Indicators (KPIs) for FY26, including:
  - 75% of high-risk suppliers complete the questionnaire at Annexure B;
  - 75% of high-risk suppliers undergoing a risk-assessment; and
  - Introducing modern slavery clauses in 100% of new and renewal supplier contracts;
- Annual review of internal policies
- Annual review of high-risk suppliers

betr also has a range of procurement and training processes aimed at preventing modern slavery entering its workplace directly. Among these are, conducting background and verification checks on all key employees and contractors prior to employment or engagement. betr employees also undergo a comprehensive induction program, including training, and have access to a wide range of guidance and policies so that they understand the importance of recognising and addressing

unethical behaviour.

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

betr Entertainment Limited solely owns and controls all of its subsidiary entities, including its main operating company betr Entertainment Aus Pty Ltd. This MSS has been made for the purpose of the Act on behalf of all those betr Entertainment Limited's entities. As such betr is required to, and has consulted with these entities in making this MSS.

betr will continue to review any updates to the Act and Modern Slavery Act Supplementary Guidance issued by the Attorney-General's Department, to assess its consultation process and make any improvements as required.

**Criterion 7: Other relevant information**

We will commit to reviewing the statement in the event to a material change of control.

## Annexure A – Approval, Signing and Mandatory Criteria

### MODERN SLAVERY ACT 2018 (CTH) – STATEMENT ANNEXURE

#### Principal Governing Body Approval

This modern slavery statement was approved by the principal governing body of betr Entertainment Limited (ACN 647 124 641), as defined by the Modern Slavery Act 2018 (Cth), on 2 November 2025.

#### Signature of Responsible Member

This modern slavery statement is signed by a responsible member of betr Entertainment Limited (ACN 647 124 641) as defined by the Act.



Signed by Matthew Tripp

**Chairman of the Board**

**betr Entertainment Limited**

#### Mandatory criteria

<b>Mandatory criteria in accordance with section 16 of the Act</b>	<b>Page number/s</b>
Statement identifying the reporting entity.	1-2
Description of the reporting entity's structure, operations and supply chains.	2-3
Description of the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	3-4
Description of the actions taken by the reporting entity and any entities it owns or controls to assess and address these risks.	4-5
Description of how the reporting entity assesses the effectiveness of these actions.	5-6
Description of the process of consultation with any entities the reporting entity owns or controls.	6
Any other relevant information.	6

## Annexure B – Higher risk supplier questionnaire format

To \_\_\_\_\_,

As part of betr's requirements under the Australian *Modern Slavery Act 2018*, we have established a Modern Slavery Statement which identifies our commitments to addressing the risks associated with modern slavery practices. Modern slavery includes forced labour, trafficking in persons, slavery and the worst forms of child labour.

One such commitment we have made in our Modern Slavery Statement, is to undertake a questionnaire with any betr suppliers who present a higher level of modern slavery risk; either through the location of their business operations, nature of their supply chain or nature of their services.

As a supplier who presents a higher modern slavery risk, we kindly ask that you complete this questionnaire by \_\_\_\_\_.

### 1 – Please provide a summary of all services provided by your business:

### 2 – Does your business have any modern slavery policies or appropriate modern slavery mitigants in place?

Yes

No

### 3- Please provide a brief summary of your supply chain, including the types of goods and services provided:

### 4- Which countries/jurisdictions are your supply chains and employees based (including if employees are remotely based)?