



Entain Australia
**Modern Slavery Statement
2023**

Entain



Entain Australia - Modern Slavery Statement 2023

Entain Group Pty Ltd (hereafter 'Entain Australia') is pleased to submit its Modern Slavery Statement for the calendar year ended 31 December 2022, as required under the Australian Commonwealth Modern Slavery Act 2018 (**the Act**).

We have prepared this statement on a consolidated basis for Entain Australia together with its related reporting entity, LB Australia Holdings Pty Ltd and parent company Entain plc. Entain plc's Modern Slavery Statement made under Section 54(1) of the UK *Modern Slavery Act 2015* can be found here: <https://entaingroup.com/sustainability/modern-slavery-statement/>.

This statement sets out Entain Australia's activities and measures taken between 1st January and 31st December 2022 to prevent modern slavery and human trafficking occurring within our own operations and extended supply chain.

About Entain

Entain plc is one of the world's largest sports-betting and gaming groups, operating in the digital and retail sectors. Incorporated in the Isle of Man and a tax resident of the UK, Entain holds domestic licenses in more than 40 jurisdictions, and employs approximately 29,000 staff in 20 locations across five continents.

The Entain Group is proud to own a comprehensive portfolio of established betting and gaming brands including; bwin, Coral, Crystalbet, Eurobet, Ladbrokes, Neds, Sportingbet, CasinoClub, Foxy Bingo, Gala, Gioco Digitale, partypoker and PartyCasino. In the US, Entain plc operates BetMGM, a joint venture with MGM Resorts International.

Across the Entain Group we own our proprietary technology across all of our core product verticals and in addition to B2C operations, we provide services to third-party customers on a B2B basis, such as licensing technology.

Sustainability is at the heart of our business. We have proudly put sustainability on an equal footing to growth as the two core elements of our strategy. We operate exclusively in regulated and regulating markets. We make sure our products are safe by leveraging our technology to protect players. Entain is now the most awarded company in the sector for safer gambling. We are proud to be a sector leader amongst many of the leading independent environmental, social and governance ('ESG') rating providers, having achieved AA status with leading ESG ratings agency MSCI, and through our continued membership of both FTSE4Good and the Dow Jones Sustainability Indices.

Included within the wider ESG agenda, the Entain Group has set a science-based target, committing to be carbon net zero by 2035 and through the Entain Foundation supports a variety of initiatives, focusing on safer gambling, grassroots sport, diversity in technology and community projects.

About Entain Australia

Within Australia, LB Australia Holdings Pty Ltd is the parent company of the Entain Australia group. Entain Australia operates the Ladbrokes and Neds wagering brands (with historical brands Betstar and Bookmaker.com.au being decommissioned in March 2023) as well as numerous cross-functional business activities and offerings including Entain Venues. From 1 June 2023, Entain Group Pty Ltd has entered into a 25-year partnering agreement to provide wagering and betting services to New Zealand residents as a delegate of TAB NZ, a body corporate established under the Racing Industry Act 2020 (NZ).

LB Australia Holdings Pty Ltd and Entain Australia are both required to report in accordance with section 5 of the Act.

Entain Australia's Structure Operations and Supply Chains

Entain Australia currently operates a process-driven, technology-based business with offices in Darwin, Sydney, Melbourne and Brisbane. We provide online wagering markets across a diverse range of Australian and international racing and sports events, operating two consumer wagering brands in Australia, and managing the TAB wagering and broadcasting business in New Zealand as a delegate of TAB NZ.

LB Australia Holdings Pty Ltd is the Australian parent company of Entain Australia. LB Australia Holdings Pty Ltd does not directly employ staff, transact with customers or engage suppliers, and falls under the same policies and procedures of Entain Australia.

The majority of our employees are skilled employees working across the main business areas of technology, marketing, corporate, operations, client services and trading. Our people are directly employed wherever possible and we maintain strict controls to ensure that both permanent and contracted staff have the legal right to work within Australia. Suitable references are received and identity confirmation checks are carried out for new employees. We minimise use of temporary labour in our offices wherever possible.

As our principal activities consist of online wagering, the majority of our suppliers consist of technology, marketing and media businesses. Any new supplier must agree to abide by our Modern Slavery Statement, our Code of Conduct and our Supplier Code of Conduct. In addition, suppliers are asked to declare if they have been subject to any form of regulatory or other investigations or enquiries involving matters related to possible bribery or corruption. This is a key step in bringing Modern Slavery to the forefront of our business processes. Like us, these businesses generally employ sizable, skilled workforces, which operate using digital technologies. We look to establish long term relationships with suppliers we trust in these areas and aim to have a low turnover of our supplier base.

Modern Slavery Risks in Our Business

We believe that our business and operating model carries intrinsically low risk in the area of Modern Slavery, however we recognise that people becoming enslaved is a key issue across the globe. We acknowledge the International Labour Organisation, almost 25 million people are estimated to be trapped in forced labour; 16 million of whom are exploited in the private sector. We take this issue seriously and prohibit all forms of slavery, both in our own operations and within our extended supply chains. Our approach to Modern Slavery is guided and reinforced by our Code of Conduct and associated policies.

Policies that are relevant to Modern Slavery

i. Our Code of Conduct

Our approach to Modern Slavery is supported by the Entain Code of Conduct. We aim to meet the highest standards in everything we do, from the way we run our business and manage our financial affairs, to how we support our people, customers and communities. We take our legal and ethical responsibilities very seriously as well as our duty to act honestly, openly and with integrity. We recognise that our commitment to the prevention of modern slavery goes beyond a legal duty.

Our Code of Conduct forms the backbone of our expectation for all people (employees and contractors) who work for, or with, Entain. It is a summary of the standards, policies and

principles of fair play, honesty and integrity that underpin Entain and is based upon our corporate values. It is reviewed annually and was last updated in April 2023. Each new version of the Code of Conduct is approved by the Group ESG Committee.

The 2022 Code of Conduct included a statement from our CEO, Jette Nygaard-Andersen, emphasising Entain's commitment to upholding the highest standards in everything we do. It explicitly set out Entain's commitment to preventing Modern Slavery and that we expect the same commitment from our employees and business partners. It also set out 10 guiding principles that govern how we do business. Those most relevant to the prevention of Modern Slavery include:

1. we take all allegations of malpractice and misconduct seriously and will deal with individuals' concerns confidentially and sensitively;
2. we promote equality, diversity, and inclusion in all our working practices;
3. we act with tolerance and empathy. There is no place in our company for bullying, harassment, victimisation, violence, threats of violence or abuse of any kind; and
4. we are committed to providing a safe working environment that promotes our people's safety, health and wellbeing.

ii. Global Modern Slavery & Human Rights Policy

In October 2022, Group reviewed and updated our Modern Slavery & Human Rights Policy, which sets out our commitment to preventing Modern Slavery. The Policy forms part of our educational efforts for employees and includes a description of Modern Slavery, warning signs to look out for, our expectations of all employees, including the requirement to not use forced or compulsory labour, comply with all applicable employment standards, take reasonable steps to ensure suppliers adhere to these requirements and raise any suspicions using our established Speak Out (Whistleblowing) process.

iii. Global Anti-bribery & Corruption Policy

The Global Anti-Bribery & Corruption Policy sets out the standards of behaviour Entain expects to ensure the integrity of our supply chains and reduce the risk of bribery and corruption across our business. Bribery and corrupt behaviour can often be closely associated with other illegal behaviour, such as Modern Slavery, and so this Policy helps to mitigate any associated Modern Slavery risks. The Policy highlights red flags (many of which can also be potential indicators of Modern Slavery), such as improper business practices, cash payments; non-standard or customised invoices; or special relationships with government officials. The Policy is reviewed annually and approved by the Audit Committee. It was last updated in September 2022.

iv. Global Procurement Policy

The objective of the Procurement Policy is to offer an efficient, informative and standardised approach to how the Group manages suppliers across the procurement lifecycle - from how we seek out new suppliers to tendering, selecting, contracting and managing the associated third-party risk(s) through to exit. The Policy ensures common minimum standards are applied through the lifecycle of an agreement with a supplier, as suppliers are required to adhere to our key policies, including the Supplier Code of Conduct (see below) and the Entain Code of Conduct. The Policy specifies that appropriate due diligence and risk management is conducted, amongst other requirements. The Policy is reviewed annually and was last updated in January 2023.

Failure to pay supplier invoices on time can lead to increased pressure on suppliers leading to

a higher risk of modern slavery in our supplier chains. We therefore strive to ensure the timely payment of suppliers in line with the terms of the Procurement Policy.

v. Global No PO, No Pay Policy

We operate a No PO (Purchase Order), No Pay Policy that is referenced in our Procurement Policy and widely communicated across the Group. This ensures all suppliers are vetted, which ensures that the right due diligence is being undertaken to mitigate, amongst other things, risks related to Modern Slavery. The Policy is reviewed annually and was last updated in February 2023.

vi. Global Supplier Code of Conduct

The Supplier Code of Conduct sets out the social, ethical and environmental standards that Entain expects from everyone who does business with us as a supplier or business partner anywhere in the world. Any new supplier must read and agree to the Supplier Code of Conduct prior to their onboarding with Entain. It includes the 10 guiding principles set out in the Entain Code of Conduct and requires suppliers to comply with all applicable laws, regulations and codes of practice, including human rights and employment laws. Any potential breaches must be notified to Entain promptly and suppliers are able to use a confidential whistleblowing email address to raise concerns.

The Code sets out the minimum labour standards Entain expects from all our suppliers. It explicitly states that suppliers must:

1. not use child labour either directly or in their supply chain and ensure they have adequate procedures and measures in place to prevent this;
2. not use forced labour;
3. ensure workers have the freedom to terminate their employment contract without unlawful penalty;
4. pay their workers at least the legal national minimum wage and provide workers with clear payroll statements;
5. provide benefits to workers that meet legal minimum standards and not unfairly deduct any benefits from their wages;
6. ensure workers do not exceed the maximum number of hours worked as set by local law;
7. not unreasonably restrict workers' freedom of movement;
8. value diversity and protect the health, safety and wellbeing of their workers; and
9. respect the rights of workers to exercise free association.

The Supplier Code of Conduct is reviewed annually and was last updated in October 2022.

vii. Global Speak Out Policy (Whistleblowing)

The Speak Out Policy encourages people to speak out about any behaviour that might be illegal, unethical or that breaches our Code of Conduct. The Policy specifically lists Modern Slavery issues (including paying fees to obtain jobs at Entain, poor labour practices or poor working conditions) as an example of the sort of issues that can be reported. It confirms that reports can be made in relation to third-party suppliers.

Concerns can be raised to a line manager or HR, Entain's secure, confidential mailbox or our independent Speak Out hotline (which is also available to suppliers and is included in the Supplier

Code of Conduct). Reports can be made to the hotline confidentially (and anonymously if desired) 24 hours a day, seven days a week.

The Speak Out Policy is reviewed annually and approved by the Audit Committee. It was last updated in July 2022.

Accessing and communicating Entain policies

Our policies are available through the Group intranet platform which all Australian employees have access to. Our Code of Conduct and other key policies (including our Anti-Bribery and Corruption Policy) are part of our induction programmes, with all new employees receiving access to these policies before they start working at Entain. This ensures they are aware of our required standards before they start working at Entain. Updates to key policies are also supported by communications across a variety of channels to raise awareness.

Entain takes breaches of our Code of Conduct, policies and procedures very seriously and will investigate and take action against colleagues as appropriate. Failure to adhere to our Code of Conduct may result in colleagues being disciplined which could lead to sanctions, up to and including dismissal.

Supplier or partner contracts may be terminated in the event of a breach of the Supplier Code of Conduct; however, we will always try to resolve issues collaboratively in the first instance. We recognise that suppliers who have failed to meet our required standards will often have done so inadvertently, so we make every effort to ensure a safe environment for suppliers and their workers to speak up about any concerns.

Training

The Code of Conduct and key policies are also supported through an effective training programme. As part of this, employees are required to complete our Code of Conduct training which includes sections on Modern Slavery, on induction for new employees and as a refresher each year. Employees are required to attest to having read the Code of Conduct as part of this training.

This module raises awareness of this important issue and covers how colleagues can confidentially raise concerns through our whistleblowing process or the usual grievance routes. Colleagues are reminded that they are fully supported to raise legitimate concerns and will never be penalised for reporting something which they genuinely believe to be wrong.

In 2022 Modern Slavery training was incorporated into “The Big Six” mandatory training programme which all employees are required to complete annually, which covers ethical topics such as safer gambling, data privacy and anti-bribery.

Recruitment and onboarding of staff

Our Recruitment Policy sets out our aim to attract a diverse workforce of people who are passionate about what they do, reflect our values, and simply want to do their best. We recruit, promote and reward people on merit.

We always operate in a legal and ethical manner with our recruitment practices and ensure an individual’s legal right to work within the given country is checked; appropriate references are received; and suitable identity documentation is available to the candidate (i.e., they have access to their passport or other similar legal document in their name and it is not held by anyone other than the employee). For some roles (e.g. senior or specialist roles), identity confirmation checks are also carried out.

Our Anti-Slavery Obligations

All Entain colleagues, particularly those responsible for recruitment and procurement, together with anybody working for us, providing services to us or working on our behalf across Entain's global operations, must:

- Not use forced or compulsory labour, i.e. any work or service that a worker performs involuntarily or under threat of penalty;
- Comply with the minimum age requirements prescribed by applicable laws;
- Compensate workers with wages and benefits that meet or exceed the legally required minimum for that country;
- Abide by applicable laws concerning the maximum hours of daily labour;
- Take reasonable steps to ensure that any sub-contractors or suppliers from whom they source goods and/or services for ultimate use by ENTAIN adhere to these requirements; and
- Bring any actual or potential cases of Modern Slavery to the attention of ENTAIN's global HR Director immediately for further investigation using our Speak Out (Whistleblowing) procedure.

Actions Taken by Entain to Assess and Address Modern Slavery Risks

In addition to our publicly available Supplier Policy, our internal processes, procedures and policies help us identify risk. Our Contracts Policy requires business owners to engage in due diligence in relation to potential suppliers. Such due diligence includes conducting initial risk assessments, various background searches and escalating any adverse findings to Senior Leaders. Where applicable, based on risk, size and strategic alignment, we enter into a commercial and contractual relationship ensuring we have an agreed set of terms and conditions setting out how we wish to trade, pricing, delivery timelines, data protection, security compliance, ethical standards and behaviours in accordance with relevant laws and jurisdictions.

i. The Procurement Lifecycle

Our procurement function has implemented a common set of processes, tools and policies that govern the way we source, review, assess and engage with our suppliers:

- We ensure we clearly capture the needs of the business
- We competitively tender such need
- We evaluate, clarify and negotiate
- We contract manage
- We exit and service transfer when such relationships come to an end

Throughout our processes we have the appropriate review mechanisms to highlight and manage risk in relation to delivery of products or services, data protection, security compliance, technical compliance and our CSR standards.

Regular communication and interactions with our suppliers are key in ensuring, where applicable, we see and evidence the working environment and practices they trade within.

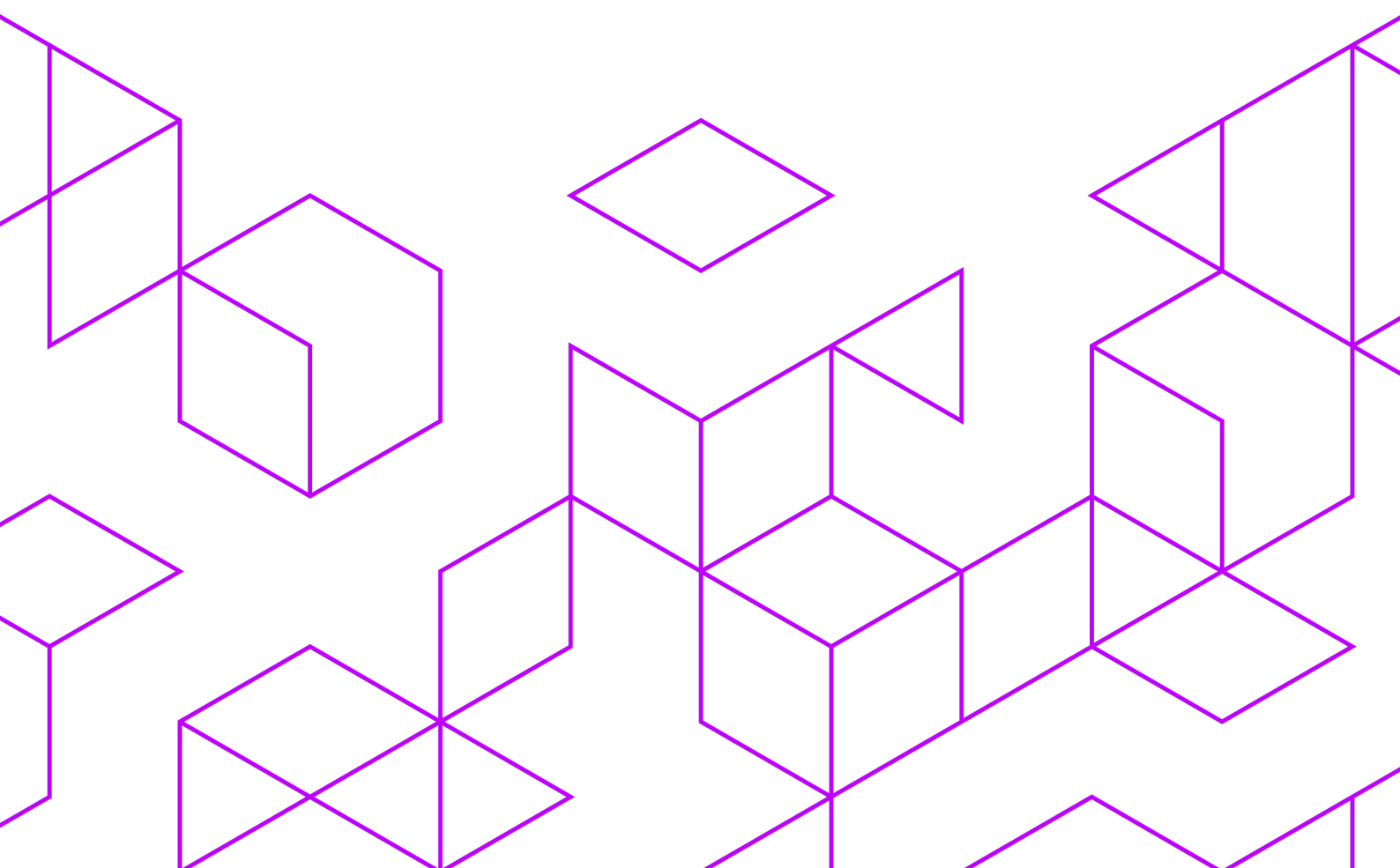
ii. Monitoring and Assessment

The Entain Code of Conduct, Modern Slavery Policy, Contracts Policy and related training materials clearly set out our expectations: that all employees and suppliers act in a proactive, legal and ethical manner at all times.

Entain Australia endeavours to maintain proactive relationships with its suppliers and continually assesses their performance and corporate standing. In 2021, we commenced updating our supplier audit processes and standard contracting terms to include human rights and Modern Slavery items and will continue to implement further measures to drive visibility within our supply chain. We also endeavour to renew and update our Modern Slavery training materials each year and continue to audit employee compliance in relation to mandatory trainings.

Entain Australia regularly consults Entain plc in relation to our governance practices, including our compliance with Modern Slavery laws and we will strive to frequently consult with them in relation to our monitoring and assessment of such practices.

The effectiveness of the steps Entain has taken in relation to Modern Slavery is assessed through testing knowledge of staff in relation to Modern Slavery through annual training modules, and compliance with other relevant policies including the Contracts Policy. Any failure to reach required thresholds of knowledge and any non-compliance with relevant policies will lead to further training and direction for the staff member involved. Effectiveness is also assessed by regular assessment of employee and contractor processes and quality assurance of contracting processes.



iii. Governance

In late 2021/early 2022, the Group conducted an internal audit reviewing the risk of Modern Slavery in Entain and our supply chains to provide an independent, objective review of our risk mitigation framework. The audit focused on (1) the adequacy of recruitment, employment management and payroll processes; (2) the adequacy and completeness of due diligence processes for third parties; (3) the inclusion of Modern Slavery in the risk management process; (4) the existence and effectiveness of key performance indicators ('KPIs') measuring performance in tackling Modern Slavery; and (5) efficiency and usage of training programmes about Modern Slavery.

The full output of the internal audit was reported to the Group Board and Audit Committee in February 2022 and shared with our external auditors. Following the audit, key improvements to the Modern Slavery framework have been made, including:

- making completion of the Code of Conduct training module (including Modern Slavery) mandatory;
- revising the risk scoring assigned to Modern Slavery to align it with the Group risk management process;
- including appropriate Modern Slavery clauses in terms and conditions with affiliates, recruitment agencies and suppliers;
- requiring new suppliers to provide details of any investigations relating to possible bribery or corruption;

Modern Slavery will continue to form an ongoing part of the audit cycle of the Group to ensure that the controls continue to work effectively and are assessed for opportunities to improve regularly.

This statement was approved by the boards of each of the reporting entities covered by this statement on 28 June 2023 and will be reviewed annually.



Dean Shannon
CEO and Director, Entain Group Pty Ltd
Director, LB Australia Holdings Pty Ltd.



Lachlan Fitt
CFO and Director, Entain Group Pty Ltd
Director, LB Australia Holdings Pty Ltd.