

Tabcorp



Modern Slavery Statement
2025

ACKNOWLEDGEMENT OF COUNTRY



Tabcorp recognises Aboriginal and Torres Strait Islander peoples as the First Australians and the Traditional Custodians of the lands on which we live, learn and work. We pay our respects to their Elders past and present.

INTRODUCTION

This Modern Slavery Statement (**Statement**) covers the activities of Tabcorp Holdings Limited (ABN 66 063 780 709). This includes the consolidated entity comprising Tabcorp Holdings Limited, and all entities owned or controlled by it (**Tabcorp** or **Group**) and the Group's interests in joint arrangements and associates. The Statement covers the financial year ended 30 June 2025 (**FY25**) and outlines the Group's actions in identifying and addressing the potential risk of modern slavery in our operations and supply chain. It also sets out how we assess the effectiveness of our actions to address modern slavery.

We take a consolidated, whole-of-group approach to addressing human rights and modern slavery. As such, this Statement addresses the actions taken by all reporting entities within the Group. Unless otherwise indicated in this Statement, the terms 'Tabcorp', 'Group', 'our business', 'we', 'us' and 'our' refer to Tabcorp Holdings Limited and its controlled entities collectively (including all reporting entities).

A list of our controlled entities is available on pages 124 and 125 of our 2025 Annual Report. A list of Tabcorp's entities that are considered reporting entities under the *Modern Slavery Act 2018 (Cth)* (**Act**) is available in the Reporting Entities section of this Statement. Tabcorp makes this joint Statement on behalf of itself and these Reporting Entities as well as all other entities owned or controlled by the Group.

WE SUPPORT



Tabcorp is a signatory to the United Nations Global Compact (**UNGC**) and a participant of the United Nations Global Compact Network Australia. We strongly support the Ten Principles of the UNGC in the areas of Human Rights, Labour, Environment and Anti-Corruption, and aim to contribute to the UN Sustainable Development Goals (**SDGs**) through our operations and supply chains.

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CHAIR'S MESSAGE



Brett Chenoweth
Chair

At Tabcorp, we believe that every person deserves to live free from exploitation, coercion, and abuse. Modern slavery has no place in our operations or supply chains, and we are committed to taking meaningful action to prevent it.

As one of Australia's largest wagering and entertainment companies, we recognise the responsibility we carry – not only to our customers and shareholders – but also to the communities in which we operate and the people who contribute to our business. One of our core values is *Trust* which means that we act with integrity, make ethical decisions, and deliver on our promises. This underpins our approach to human rights and responsible procurement.

This Modern Slavery Statement outlines the steps we have taken to identify, assess and address risks of modern slavery across our business and supply chains. It reflects our ongoing commitment to transparency, continuous improvement, and collaboration with our suppliers and stakeholders.

During the year, we deepened our understanding of modern slavery risks within our operations and supply chains. We also strengthened support for our team members and suppliers, helping them to better identify, assess and manage these risks.

We progressed our Anti-Modern Slavery Strategy and Roadmap to improve our actions and reporting practices in this area. These improvements are helping us embed a more proactive and accountable approach to identifying and mitigating modern slavery risks across our business and supply chains.

We are proud of the progress we've made, but we know there is more to do. Tackling modern slavery requires constant vigilance and collective action – and we remain steadfast in our commitment to being part of the solution.

A handwritten signature in black ink, appearing to read 'Brett Chenoweth', written over a faint horizontal line.

Brett Chenoweth
Chair

9 December 2025

ABOUT TABCORP

OUR OPERATIONS

We're a public company listed on the Australian Securities Exchange (ASX: TAH), with corporate offices in Melbourne, Sydney and Brisbane.

We operate a portfolio of leading Australian brands across wagering, media and integrity services, with national scale and reach.



DIGITAL



RETAIL AND ON-COURSE
~4,000 TAB VENUES¹



VISION

We also operate complementary international wagering and broadcasting businesses.

Media broadcasting



Media distribution and licensed tote provider in USA



Wagering pooling hub in Isle of Man



OUR VALUES



TEAM

We believe in the power of **team**. We are accountable to one another, support each other through challenges and successes, and prioritise collective achievement over individual recognition.



TRUST

Trust is at the heart of everything we do. We act with integrity, make ethical decisions, and deliver on our promises. Trust enables us to take bold steps, knowing we have each other's support.



FUN

We believe work should be fun. Fun strengthens our connections, fuels creativity, and reflects our role in the entertainment industry. We're serious when we need to be, but we don't take ourselves too seriously.



WIN

We are driven to win. We set ambitious goals, act with urgency, and consistently deliver outstanding results. We innovate, lead, and celebrate our successes loudly.

1. TAB venues include agencies, hotels, pubs, clubs and on-course.

OUR BRANDS



TAB is Australia's biggest multi-channel wagering brand, offering a broad range of betting experiences across digital channels and in retail throughout Victoria, New South Wales, Queensland, South Australia, Tasmania, Northern Territory and the ACT.



Premier Gateway International is one of the largest global wagering and tote pooling hubs, based in the Isle of Man.



Sky Racing is Australia's leading racing network, broadcasting over 150,000 races live every year into Australian homes, 4,000 retail venues and on the TAB App.



Sky Racing World is a US-based distributor of international racing content and facilitator of associated tote pools.

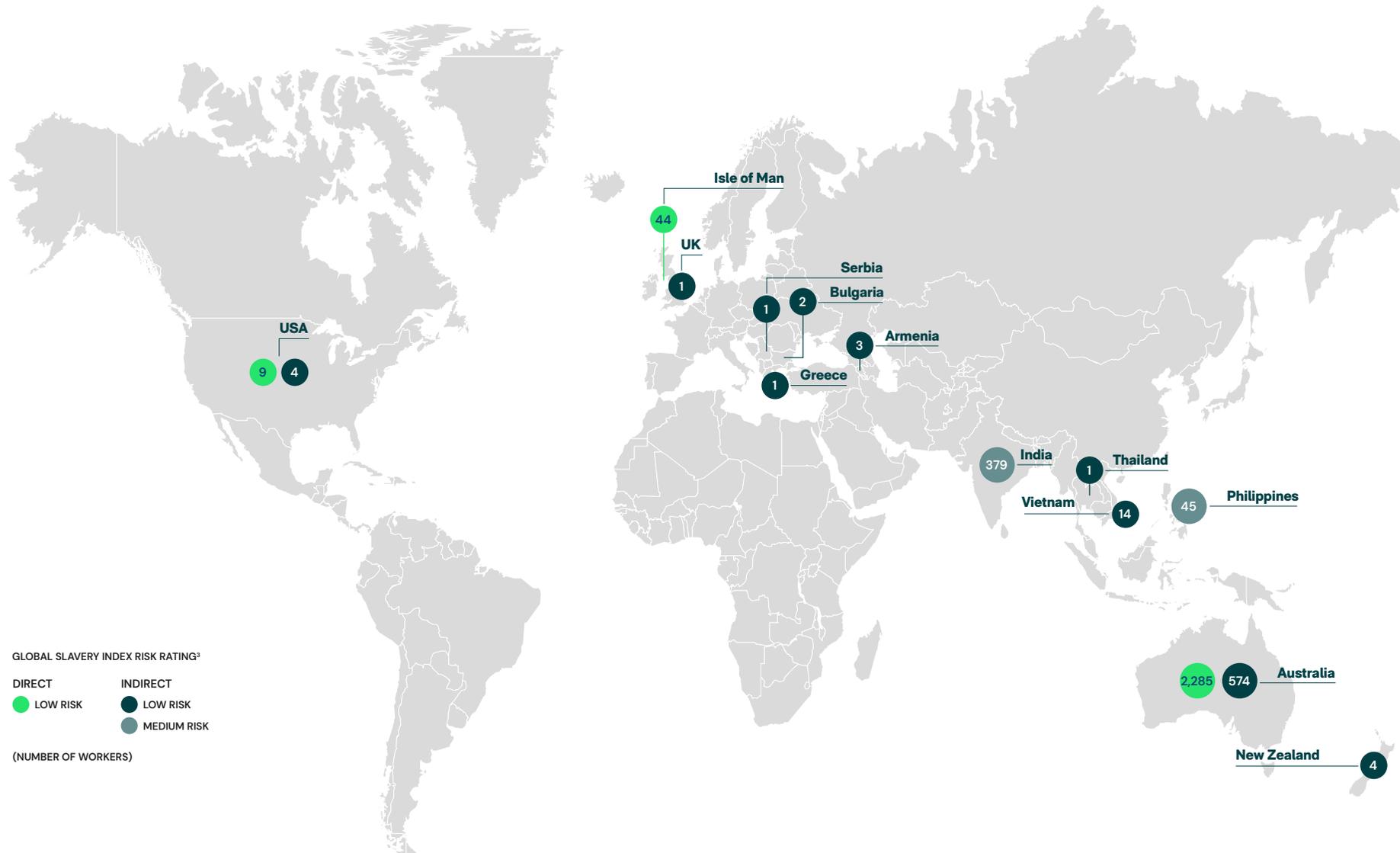


MAX is Australia's leading integrity services provider, offering electronic gaming machine monitoring and related integrity services, and other gaming-related services to venues.

ABOUT TABCORP CONTINUED

OUR WORKFORCE

As of 30 June 2025, we directly employ or engage 2,338 team members (**direct workforce**). We also engage 1,029 people hired through third parties (**indirect workforce²**).



2. Indirect workforce refers to vendor resources (hired through third parties). Refer to page 14 for additional information.

3. The Global Slavery Index is a national breakdown of the extent of modern slavery in 160 countries. This document is produced annually by human rights group Walk Free.

ABOUT TABCORP CONTINUED

OUR SUPPLY CHAIN

We provide media, integrity and omnichannel wagering services to our customers. Our omnichannel wagering services include digital and retail through a network of agencies (**retail partners**), venues and on-course across Australia. We also source products and services from suppliers and contractors locally and from overseas. In FY25:

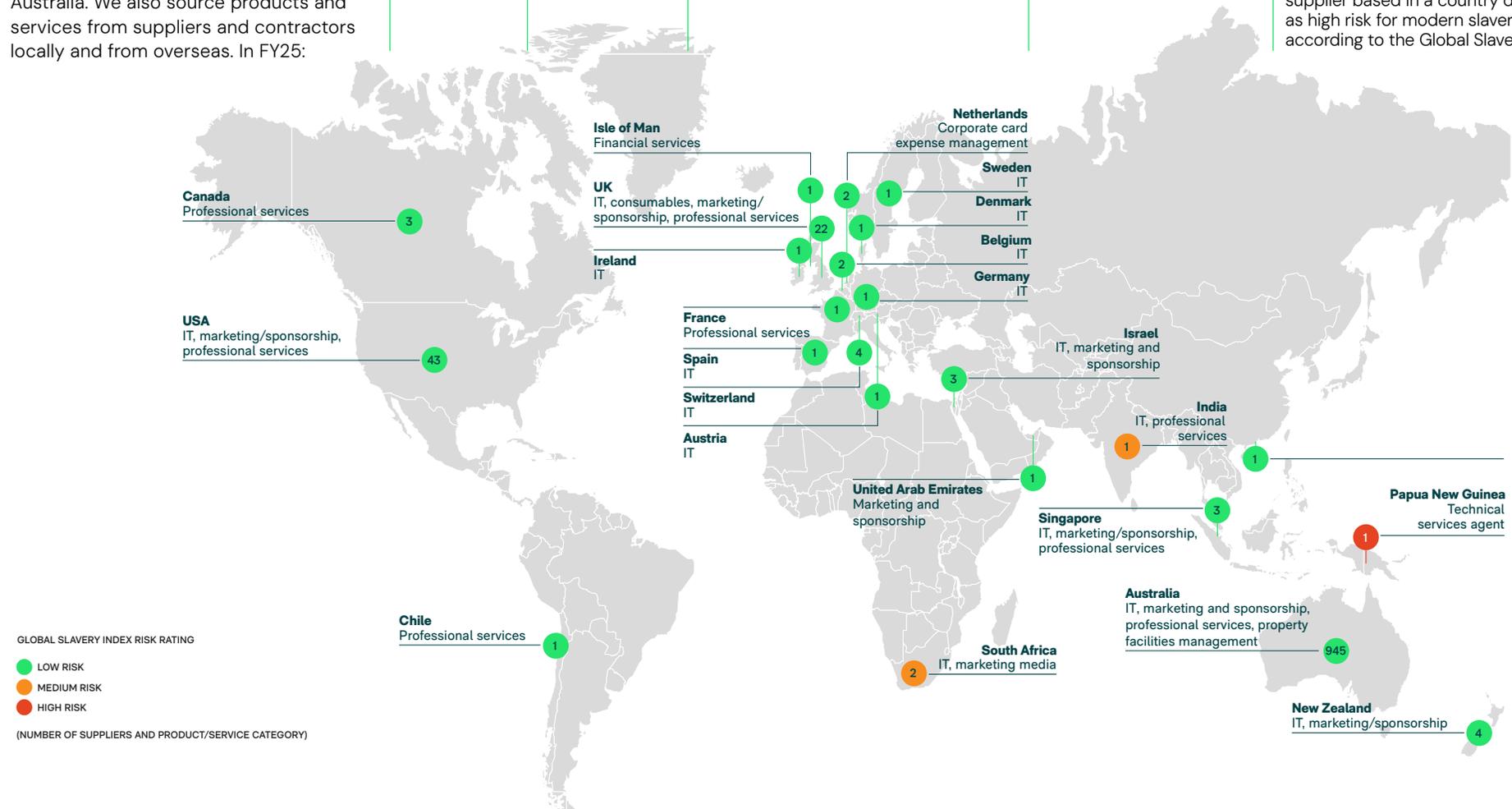
We engaged directly with 1,045 suppliers and contractors.

Approximately 85% of our total spend was with 106 suppliers.

Our largest category of spend was information and communication technology at 38.9%. This includes items used to develop and manage our systems, cloud platforms, hardware and software purchases, and purchases within our Integrity Services business.

61.1% of the remaining procurement spend was on activities including marketing and sponsorship, property, recruitment and professional services, travel and consumables.

8.5% of total procurement spend was with 100 international suppliers⁴ located outside Australia. 99.99% of this spend was with suppliers based in countries deemed as low or medium risk for modern slavery. The remaining 0.01% was with one supplier based in a country deemed as high risk for modern slavery according to the Global Slavery Index.



4. Refers to suppliers without an ABN registration, where payment is made to an overseas account.

RESPONSIBILITY TO RESPECT HUMAN RIGHTS

The United Nations Guiding Principles on Business and Human Rights require all businesses – regardless of size or structure – to respect human rights by:

- avoiding harm through their own actions and addressing any impacts they cause; and
- managing risks linked to their operations, products, or services – even if they didn't directly cause them.

We put this responsibility into practice by following a six-step due diligence process⁵, aligned with the Organisation for Economic Co-operation and Development (OECD)⁶.



Details of our due diligence process are outlined on the next pages.

5. Adapted from the OECD Due Diligence Guidance for Responsible Business Conduct.

6. The OECD is an international organisation that works to build better policies for better lives. It helps governments to shape policies that foster prosperity and opportunity, underpinned by equality and well-being.

SUSTAINABILITY FRAMEWORK

We are committed to respecting and advancing the human rights of all people impacted by our operations and business relationships. This commitment is reflected in our Sustainability Framework (shown below).

OUR PRIORITIES	 Customer Care	 Contribute to our Community	 Support our People to Succeed	 Build a Sustainable Future
GUIDING PRINCIPLES	<ul style="list-style-type: none"> We put our customers first, delivering experiences safely and responsibly 	<ul style="list-style-type: none"> We build collaborative partnerships to shape our industry and impact our communities for the better 	<ul style="list-style-type: none"> We provide our people with an exciting workplace to succeed 	<ul style="list-style-type: none"> We are building a sustainable future for our business
OUR GOALS	<ul style="list-style-type: none"> Deliver customer-centric safer gambling initiatives designed to prevent and minimise harm Build and maintain cyber security controls that protect our customers privacy and security and drive competitive advantage through customer and stakeholder trust 	<ul style="list-style-type: none"> Contribute to the strength of our stakeholders through shared economic benefits and industry support Deliver strategic community partnerships and investment to support the communities we operate in Engage on key industry issues such as animal welfare and sports integrity 	<ul style="list-style-type: none"> Foster a diverse, equitable and inclusive workplace Invest in the health, safety and wellbeing of our team Attract the best talent and support our team to shape their careers 	<ul style="list-style-type: none"> Deliver a robust, transparent and effective approach to ESG Develop a Net Zero roadmap to support our emission reduction targets Source products and services responsibly and sustainably
ALIGNMENT WITH UN SUSTAINABLE DEVELOPMENT GOALS			    	    



Received an
'A' RATING
 from Monash University
 for the quality of our
 FY23 Modern Slavery
 Statement, in their report
 released in November 2024⁷

7. Pham, N., Cui, B., & Ruthbah, U. (2024) Modern Slavery Disclosure Quality Ratings: ASX100 Companies Update 2024 [Research brief], Monash Centre for Financial Studies, Monash University School. DOI: 10.26180/27645072.

Our detailed ESG approach and performance is set out in our 2025 Sustainability Report available at www.tabcorp.com.au/sustainability.

ANTI-MODERN SLAVERY STRATEGY

We continue to progress our Anti-Modern Slavery Strategy and Roadmap (**Strategy**). The Strategy aims to improve our actions and reporting practices in this area, following an independent review of our 2023 Modern Slavery Statement in FY24.

A high level overview of the Strategy, and our progress during FY25 is outlined opposite.

OUR GOAL	Build a sustainable future by sourcing products and services responsibly and sustainably						
OUR COMMITMENT	We're committed to identify, prevent and mitigate modern slavery risks across our operations and supply chains. We do this through effective governance and risk management, in partnership with our key stakeholders						
STRATEGIC PILLARS	<p>Due Diligence and Responsible Procurement > Risk Management > Stakeholder Engagement and Education > Effectiveness > Continuous Improvement</p>						
KEY STRATEGIC INITIATIVES	 Supply Chain and Operational Risk Assessment	 Source to Contract Roadmap	 Audits	 Policy Reviews	 Capability Uplift	 KPIs Review	 Reporting Uplift
FY25 PROGRESS	Further integrated anti-modern slavery supplier qualification into our procurement process. Qualification outcomes are recorded in the supplier master data, enabling traceability, improved compliance tracking, and proactive risk monitoring.	<p>Uplifted supplier due diligence capabilities by implementing new technology to enhance the supplier risk assessment processes.</p> <p>Reached 73% supplier compliance with modern slavery qualification or due diligence requirements through our supplier portal. The remaining 27% compliance was achieved through a manual process, pre-online registration implementation.</p>	Engaged an independent third party to audit key suppliers. These suppliers were selected based on high-risk industries, the Global Slavery Index and our seven key criteria risk assessment. The audits are scheduled to be completed in FY26.	Updated our Whistleblower Policy to reflect recent legislative changes in FY25.	Suppliers receive modern slavery training materials as part of the self-registration and modern slavery assessment process. This is designed to strengthen their awareness and understanding of modern slavery risks, compliance expectations, contractual obligations, and Tabcorp's escalation process.	Reviewed key performance indicators used to measure the effectiveness of our actions to address modern slavery. One new KPI has been added as a result ⁸ .	Continued to implement recommendations identified by an independent third party to further enhance our disclosures and align with emerging best practice reporting.

8. Refer to the Effectiveness section on page 26.

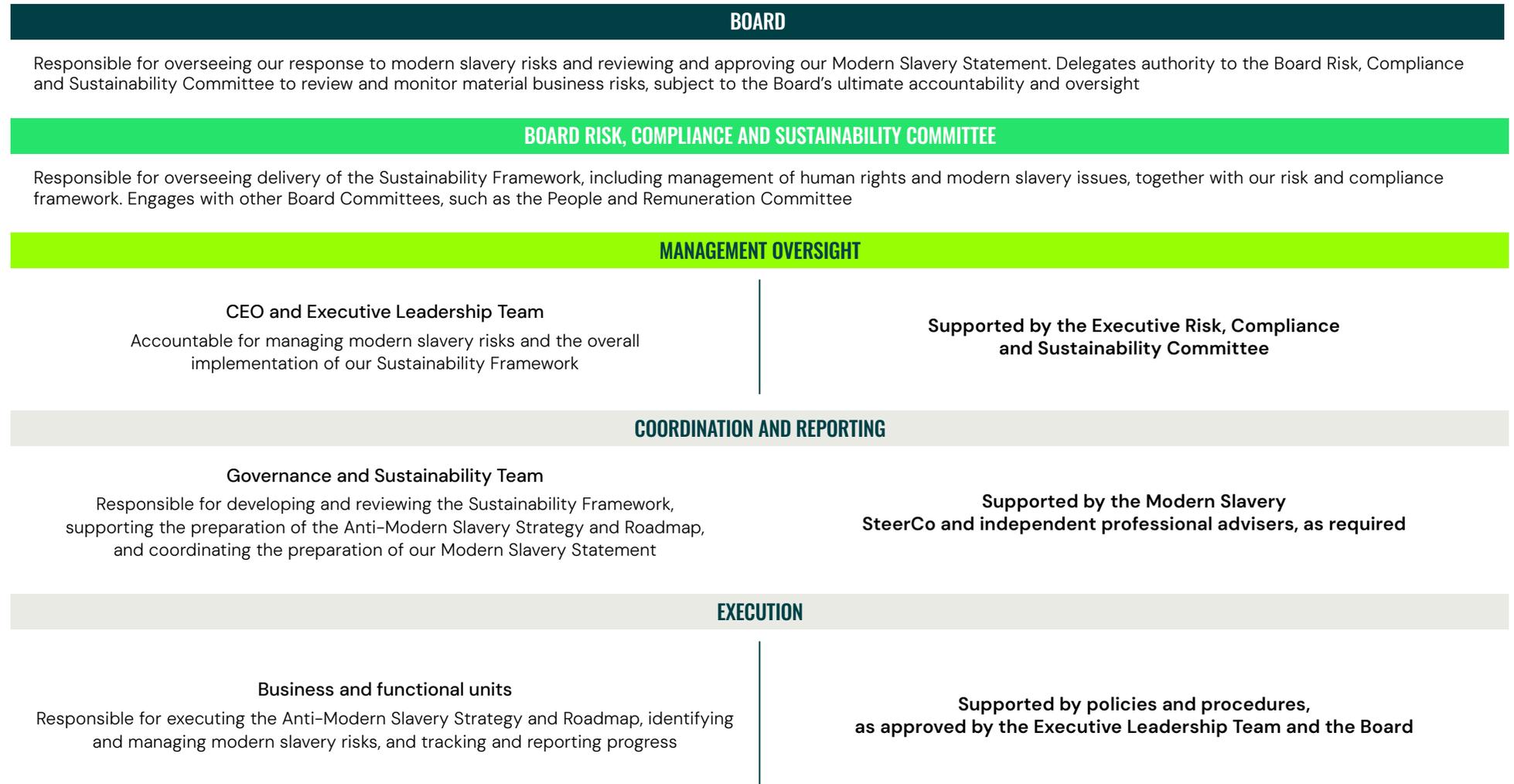
9. Pham, N., Cui, B., & Ruthbah, U. (2024) Modern Slavery Disclosure Quality Ratings: ASX100 Companies Update 2024 [Research brief]. Monash Centre for Financial Studies, Monash Business School. DOI: 10.26180/27645072.

GOVERNANCE

Our corporate governance framework for addressing human rights and modern slavery is fundamental to our ambition to lead the industry in sustainability. It helps us embed ethical responsibility in our decision-making and drives accountability at every level of our organisation.

Our Executive and Board Risk, Compliance and Sustainability Committees are responsible for overseeing our Sustainability Framework, which includes our response to modern slavery risks.

We report our progress quarterly through these Committees, and annually in this Statement. A summary of our governance framework is outlined in the table below.



POLICY FRAMEWORK

We maintain a suite of policies and codes designed to address modern slavery in our operations and supply chains, as outlined below. These documents form a critical part of our governance framework and are regularly reviewed and updated for relevance and effectiveness. Oversight is provided by our Executive Leadership Team, Board of Directors and its committees.

<p>Code of Conduct </p> <p>Defines our expected standards of behaviour across eleven guiding principles, including: acting ethically and with integrity; treating people with dignity and respect; and calling out dishonest and unethical behaviour</p>	<p>Supplier Code of Conduct </p> <p>Outlines the expectations we have of our suppliers across six areas, including: integrity, ethics and corporate conduct; labour and human rights; and health, safety and wellbeing</p>	<p>Human Rights Policy </p> <p>Formalises our commitment to respecting the human rights of the people we interact with and who are impacted by our business operations and relationships</p>	<p>Whistleblower Policy </p> <p>Describes the process for making and investigating a disclosure, in line with applicable whistleblower protection legislation</p>	<p>Inclusion and Diversity Policy </p> <p>Sets out our commitment to a culture of inclusion and the creation of a bias free workplace where all are welcomed and respected</p>
<p>Workplace Health, Safety and Wellbeing Policy </p> <p>Outlines our commitment 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</p>	<p>Talent Acquisition Policy </p> <p>Defines our approach to the selection and recruitment of team members, in order to maintain a framework that's lawful, rigorous, transparent, and aligns with our inclusion and diversity objectives</p>	<p>Anti-Bribery and Corruption Policy </p> <p>Sets out our commitment to the highest levels of ethical behaviour, including zero tolerance for bribery, corruption and fraudulent or dishonest conduct by team members in any form</p>	<p>Respect@ Work Position Statement </p> <p>Formalises our commitment to providing a workplace free from sexual harassment, sex-based harassment, discrimination and other inappropriate behaviour</p>	<p>Domestic and Family Violence Support Policy </p> <p>Provides a framework to support team members who are affected by situations of domestic and family abuse or violence, so they feel supported and can come forward for help and continue to participate in the workplace</p>
<p>Procurement Policy </p> <p>Sets out our approach to procuring goods and services, including individuals' accountability for their procurement decisions. It also outlines team members' obligations before selecting new suppliers, such as performing appropriate due diligence, in line with our procurement guidelines</p>	<p>Sanctions Policy </p> <p>Outlines our sanctions management principles and team members' obligations, and expected conduct to manage and comply with sanctions laws. Sanctions may be used in cases where, for example, a country or regime is violating human rights, waging war or endangering international peace and security</p>	<p>Anti-Money Laundering and Counter-Terrorism Financing Policy (AML/CTF) </p> <p>Outlines our commitment to disrupting and combating money laundering activities, terrorism financing and other serious financial crimes (such as tax evasion, drug dealing, human trafficking, cheating at gambling). It also articulates AML/CTF compliance obligations required from all team members</p>		

A number of these policies are available from the Tabcorp website at www.tabcorp.com.au/company/corporate-governance. These policies are in addition to our risk and compliance management policies. Refer to the Risk Management section on pages 17 to 21.

STAKEHOLDER ENGAGEMENT

We engage and collaborate with several stakeholders to address modern slavery, improve our knowledge and leverage best practice reporting. Examples of how we engage with our stakeholders and topics of interest identified through our materiality assessment process, are outlined on page 11 of our 2025 Sustainability Report.

We maintain memberships or representation of industry groups, professional associations and advisory bodies. During FY25, these memberships and forums remained unchanged and included:

	Procurement Leaders	<p>Procurement Leaders is a global community of procurement professionals that provides strategy development and peer-to-peer benchmarking for professionals in this area. This membership provides access to cutting-edge research, guidance and an expert network of professionals. This network allows us to share learnings and resources regarding sustainable procurement and modern slavery risks</p>
	Fintel Alliance	<p>The Fintel Alliance is AUSTRAC's public-private partnership that brings together financial crime intelligence professionals and law enforcement agencies to collaborate on solutions to combat serious and organised crime, including child sexual exploitation and forced sexual servitude</p>
	United Nations Global Compact Network Australia (UNGCNA) Community of Practice	<p>The UNGCNA Community of Practice is a peer-to-peer network that enables participants to share learnings and practices about modern slavery reporting and risk management</p>
	National Retail Association (NRA) ESG Committee	<p>The NRA ESG Committee is a forum where participants can connect, navigate new developments, share learnings regarding ESG and consider ways to go beyond regulatory requirements. ESG topics include human rights and modern slavery</p>
	Association of Certified Anti-Money Laundering Specialists (ACAMS)	<p>The ACAMS is the largest international membership organisation for Anti-Financial Crime professionals. It aims to advance the professional knowledge, skills and experience of those dedicated to the prevention and detection of financial crime, including proceeds of crime from modern slavery and human trafficking, and child exploitation</p>
	Sustainability Leaders Network	<p>We're part of an informal peer-led network of sustainability professionals who work together to advance sustainable practices and ESG disclosures. Through monthly meetings, this cross-sector collaboration enables the sharing of best practices and discussion of innovative solutions for achieving sustainability goals. Topics of discussion include climate change, human rights and modern slavery</p>

 We regularly engage with industry partners and associations regarding our Fair Work Compliance program to provide holistic guidance and support to our retail partners in the administration of their employment obligations

RISK IDENTIFICATION

We monitor modern slavery risks through a combination of supplier screenings and engagement, retail network account management, risk assessments, audits, grievances management, team member insights, regulatory trends, industry insights, media screening, civil society reports, and engagement with human rights professionals and non-government organisations. These diverse sources help us identify and prioritise our response to the most salient human rights risks in our operations and supply chains.

Our operations

Direct workforce

Our people are the driving force behind our strategy, providing the critical skills, knowledge and expertise to bring it to life. Our commitment to respecting human rights starts with them.

As of 30 June 2025, we directly employed or engaged:



Our team members are either covered by enterprise/collective agreements (32.3%) or have individual employment contracts.

We are committed to complying with all applicable laws and regulations with respect to wages, working hours, leave entitlements, superannuation, health and safety, and workers' compensation insurance. We regularly undertake, and at least annually, a minimum wage review across all our operations to confirm that our team members are appropriately remunerated and are compensated in accordance with relevant awards or enterprise/collective agreements, where applicable.

We support our people to succeed and offer a number of benefits, including a wide range of learning and development opportunities, generous leave policies, a flexible work policy and a people-first reward and recognition program. Team members also have access to a range of discounts, offers and a wellbeing platform that offers 24/7 personal safety, medical, and mental health support for team members and their families. These additional benefits are summarised below:

INCLUSION AND DIVERSITY	TEAM MEMBER BENEFITS	WELLBEING	COMMUNITY
<ul style="list-style-type: none"> Gender affirmation support Inclusion and diversity programmes and activities HESTA 40:40 Vision signatory Member of Pride in Diversity Cultural leave Respect@Work program 	<ul style="list-style-type: none"> Supportive working practices, such as bonus leave and 18 weeks of paid parental leave for all new parents Learning and development programs Monthly social events and state-based social clubs Corporate discounts Employee share scheme 	<ul style="list-style-type: none"> Domestic and family violence support Free confidential external support services Wellbeing programs and activities Flexible leave, including flexible public holiday leave Recognition program Natural disaster leave and financial support 	<ul style="list-style-type: none"> Team member and community engagement and volunteering programs Volunteer leave

RISK IDENTIFICATION CONTINUED

The inherent risk of modern slavery in our direct workforce is assessed as low, based on our profile. We have strong policies, communications channels, ongoing monitoring, team member training and accessible grievance mechanisms to mitigate the risk of modern slavery in our operations.

We have onboarding controls to reduce the risk that we could inadvertently employ minors, or individuals without the appropriate visa status or conditions. For example, an underage candidate would be identified through our recruitment screening process, including through the interview stage, completion of employment forms and provision of ID documentation.

Indirect workforce

We engage 1,029 people hired through third parties. These are vendor resources in professional roles, such as IT, marketing and finance, and are not included in our team member headcount.

These workers are engaged through vendors mostly based in Australia, with service delivery taking place from local and offshore offices of these vendors, as summarised on page 5.

The inherent risk of modern slavery for our indirect workforce is assessed as higher than for our direct workforce. This is because some of the offshore vendor offices are in countries with weaker legal and governance standards. We seek to address this risk by adopting a robust risk management framework, as outlined in the Supplier risk management and due diligence section.

Our supply chain

We identify and assess risks of modern slavery in our supply chain by actively reviewing a number of risk factors, as provided by expert organisations such as the International Labour Organization and Walk Free. These risk factors are outlined opposite.

 LOCATION	 CATEGORY	 BUSINESS MODEL	 VULNERABLE GROUPS
Countries or regions considered to have higher human rights (including modern slavery) risks	Categories of products, services and industry sectors regarded as having more significant inherent modern slavery risks	Business models structured around high risk work practices or complex supply chain arrangements	Individuals or groups more likely to be exposed or susceptible to harm, or unable to advocate for themselves in exploitative situations
Modern slavery risk is often higher in geographies with weak governance (including weak rule of law and corruption), high rates of conflict, displacement or contested land use, a record of State failure to protect human rights, and remote or isolated areas with limited access to social or economic support and infrastructure	Modern slavery risk is often higher for certain categories of products, raw materials, services and industry sectors (such as electronics products and manufacturing), due to their operational and supply chain models, workforce structure and characteristics, and the geographies in which they operate or source from	Modern slavery risk is often higher within business models that are reliant on high risk work practices or complex supply chain arrangements that introduce a layer of aggressive pricing or time pressures, precarious work demands, or with poor recruitment practices and working conditions	Certain individuals or groups may be more vulnerable to experiencing modern slavery. This might be influenced by socio-demographic and geographic factors such as cultural and language barriers, level of education and literacy, visa insecurity, residency or citizenship status, gender, age, disability and remoteness or isolation

RISK IDENTIFICATION CONTINUED

Our team proactively analyses and identifies risk areas in our supply chain where modern slavery may exist. These areas are summarised in the table below, and further described in the next sections.

Risk area	Inherent risk rating	Risk factors	Risk mitigation	Residual risk rating
 RETAIL AGENCIES	●	Retail partners may employ migrant workers, people in financial hardship, and underage workers to deliver services related to TAB	Agreements in place with our Retail Agencies requiring compliance with regulations and legislation. Fair Work Retail Compliance Program and Retail Workers Hotline. AML/CTF programs are also in place, which include adverse media and WorldCheck ¹⁰ screening of our retail operators	●
 RETAIL LICENSED VENUES	●		Agreements in place with our Retail Licensed Venues requiring compliance with regulations and legislation. AML/CTF programs are also in place, which include adverse media and WorldCheck screening of our retail operators	●
 INDUSTRY PARTNERS	●	Industry partners may employ or subcontract with entities that employ migrant workers, people in financial hardship, and underage workers to deliver services related to Tabcorp	Regular engagement with industry partners and Tabcorp whistleblower program	●
 INTERNATIONAL BUSINESSES	●	Risk that Tabcorp's international businesses (PGI and Sky Racing World) or their third party partners may engage in, or be linked to, practices that breach domestic or international modern slavery laws or regulations	Tabcorp whistleblower program	●
 LABOUR HIRE/ SERVICES	●	Risk that Tabcorp utilises onshore/offshore labour hire firms, vendor resources and contractors across various categories that do not comply with modern slavery obligations. For example, cleaning and maintenance, security, marketing, onshore and offshore technology subcontractors	Modern slavery contractual clauses requiring compliance with our policies and codes, including: Human Rights Policy and Supplier Code of Conduct; regular engagement and risk assessment/due diligence with labour hire firms, vendor resources and contractors; supplier training; independent audit program; and whistleblower program. AML/CTF programs are also in place, which include adverse media and WorldCheck screening of our suppliers	●
 DIRECT AND INDIRECT SOURCING OF GOODS	●	Supply chain not well understood resulting in component hardware, equipment and merchandising sourced by Tabcorp being manufactured by entities that do not comply with modern slavery requirements. This risk is higher for branded products/merchandise	Modern slavery contractual clauses requiring compliance with our policies and codes, including: Human Rights Policy and Supplier Code of Conduct; regular engagement and risk assessment/due diligence with suppliers; ongoing supplier governance; supplier training; independent audit program; and whistleblower program. AML/CTF programs are also in place, which include adverse media and WorldCheck screening of our suppliers	●
 CUSTOMERS	●	Risk that we may have individual customers (and/or their immediate families) who are vulnerable to modern slavery through their personal circumstances. Risk that customers misuse our products or services to facilitate or benefit from modern slavery, including human trafficking and child sexual exploitation	We provide training and education for relevant team members to identify signs of modern slavery, and a whistleblower program is in place. AML/CTF programs are also in place, which include adverse media screening, customer verification and screening, and transaction monitoring	●
 COMMUNITY	●	Our sponsorships, partnerships, or charitable donations may support organisations connected to modern slavery, in particular where these organisations operate in or source from industries or countries that have a higher modern slavery risk	Supplier Code of Conduct and whistleblower program are in place	●

10. WorldCheck is an AML/CTF watchlist datafile, provided by the London Stock Exchange Group. Reports of individuals and companies suspected, accused, arrested or convicted of modern slavery offences are included in WorldCheck. We screen our suppliers against that datafile on a daily basis.

Risk rating key: ● High ● Medium ● Low

RISK IDENTIFICATION CONTINUED

The link between modern slavery and other serious crimes

Modern slavery is often intertwined with other serious crimes, including money laundering and domestic violence.

Criminal networks involved in modern slavery frequently use money laundering to conceal the profits gained from exploiting vulnerable individuals, moving illicit funds through complex financial systems to make them appear legitimate.

At the same time, domestic violence can be both a cause and consequence of modern slavery, particularly in cases where victims are coerced or controlled by intimate partners or family members. These individuals may be forced into exploitative labour or servitude under threats of violence, creating a cycle of abuse that is difficult to escape.

Together, these crimes reinforce each other, making detection and intervention more challenging and highlighting the need for a coordinated, multi-agency response to protect victims and disrupt criminal operations.

Our response:



Money laundering

We play a critical role in identifying and disrupting criminal activities and have an anti-money laundering and counter-terrorism financing (AML/CTF) program in place. Our program aims to identify, manage and mitigate the risk that our products and services may be used for money laundering or the financing of terrorism by our customers.

We also engage with the Australian Transaction Reports and Analysis Centre (AUSTRAC) at multiple levels through customer and transaction level reporting and to share intelligence and other compliance and regulatory matters.

Detailed information about our AML/CTF program is available on page 64 of our 2025 Sustainability Report.



Domestic violence

We continue to support organisations that bring awareness and provide support to people experiencing domestic violence.

We partnered with DV Safe Phone once again this year to bring awareness to our team and encourage them to support the cause by donating money and/or their old phones.

DV Safe Phone is a charity that collects, refurbishes and distributes donated phones to survivors of domestic violence, helping them stay connected and safe.

Together, our team helped raise funds, which were matched by Tabcorp's donation matching policy, taking the total to \$3,020.

RISK MANAGEMENT

Our Risk Management Framework, policies and procedures set out the roles, responsibilities and guidelines for managing risks associated with our business, including human rights and modern slavery risks. The Framework enables the identification, evaluation, monitoring, mitigation, management, reporting and oversight of risk throughout the Group. When assessing modern slavery risks, we consider the risk to both people and to Tabcorp.

Risk assessments of modern slavery in our operations and supply chains consider risks that cause, contribute or are directly linked to modern slavery practices, as described in the diagram opposite. We assess these risks based on the United Nations Guiding Principles on Business and Human Rights, companies with similar business models, and publicly available information on this topic.

Our cross-functional Modern Slavery Steering Committee (**SteerCo**) oversees the implementation of our Anti-Modern Slavery Strategy and Roadmap. The SteerCo is sponsored by our Chief Legal Officer and comprises senior managers from our Procurement, People and Culture, Legal, Risk and Sustainability teams.

We report human rights and modern slavery risk-related information to both the Executive and Board Risk, Compliance and Sustainability (**BRCS**) Committees. In turn, the BRCS Committee reports to the Board of Directors. All team members are responsible for managing these risks.

CAUSE 	CONTRIBUTE 	DIRECTLY LINKED 
 <p>We may 'cause' modern slavery when our actions (or omissions) would in themselves result in significant risk of modern slavery.</p> <p>Example: By employing underage workers and subjecting them to harmful work.</p>	 <p>We may 'contribute to' modern slavery when our actions (or omissions) increase the risk of modern slavery occurring even if we didn't actually cause it.</p> <p>Example: By putting significant cost and time pressure on suppliers, leading to excessive overtime and unfair wages.</p>	 <p>We may be 'directly linked to' modern slavery when we have a business relationship (in particular through our supply chain) and that entity causes or contributes to modern slavery or materially increases the risk of modern slavery.</p> <p>Example: By purchasing from a supplier who is using subcontractors who are producing goods using forced or child labour.</p>
Low Risk for Tabcorp	Low Risk for Tabcorp	High Risk for Tabcorp

RISK MANAGEMENT CONTINUED

Fair Work Retail Compliance Program

We provide our services online and through a network of retail partners across Australia.

We have undertaken work to protect vulnerable workers and prevent potential contraventions of the *Fair Work Amendment (Protecting Vulnerable Workers) Act 2017 (Fair Work Act)* across our retail agencies. We have a program in place which assists in promoting compliance with the Fair Work Act regarding minimum rates of pay, awards and enterprise agreements to our retail partners. The program comprises four steps:

STEP 1



DEFINE THE STANDARD

We clearly communicate expectations and responsibilities to our retail partners through contractual terms and our Operations Manual. These terms include compliance with workplace laws and Tabcorp's right to audit and access records, where required.

STEP 2



EMPOWER THROUGH KNOWLEDGE

We provide education and training to build awareness and capability. We offer templates and guidance materials to our retail partners to promote awareness of obligations and consequences of noncompliance with workplace laws. We train our business development managers to build awareness of our partners' workplace obligations and Tabcorp's role in upholding them.

STEP 3



CHECK AND CHALLENGE

We require our retail partners to complete online self-audits on their key obligations as employers. We also undertake annual site surveys, which requires the retail partner or their employees to answer a series of brief questions. These surveys enable us to better monitor the effectiveness of our program by capturing potential noncompliance or information gaps.

We have established a dedicated Retail Workers Hotline, managed independently by Deloitte, to enable our retail partners and their employees to anonymously report suspected noncompliance or concerns regarding workplace entitlements.

STEP 4



ACT WITH PURPOSE

We take corrective action and strengthen safeguards where needed. We have developed a process and governance framework to respond to known or suspected noncompliance across our retail partners. Our approach is to work collaboratively with retail partners to confirm understanding of requirements and promote compliance with the Fair Work Act. If we are unable to reach a satisfactory resolution to rectify a breach, we may suspend or terminate an agreement with a retail partner.

We have not identified any material breaches of the Fair Work Act during FY25.

RISK MANAGEMENT CONTINUED

Supplier risk management and due diligence

We maintain centralised processes for supplier onboarding pre-qualification, contracting, monitoring and relationship management. We take this approach for consistency and compliance across the business. All potential and active suppliers undergo due diligence and continuous screening using the LSEG World-Check risk intelligence database. Screening is performed nightly, enabling near real-time identification and management of modern slavery indicators, as well as sanctions exposures, politically exposed persons (PEPs), adverse media and other financial-crime risk factors. This process includes assessment for:

 **Anti-money laundering**

 **Sanctions lists**

 **Adverse media monitoring**

 **Labour license status**

As part of the supplier onboarding process, suppliers are required to confirm their alignment with the Tabcorp Supplier Code of Conduct and

disclose any gaps or breaches. Where appropriate, we request supporting evidence or independent audit reports to validate compliance. Following onboarding, all active suppliers are subject to ongoing regular sanctions and risk screening to confirm continued adherence to our standards and to support proactive identification of potential modern slavery risks. This process applies to all active suppliers.

We have adopted Supplier Relationship Management practices that prioritise continuous evaluation and adaptation to evolving business needs and emerging risks.

We segment our suppliers using a three-step process that considers several critical factors, including:

1. Risk profile  The potential risks associated with the supplier, particularly in areas like human rights and modern slavery

2. Business criticality  The strategic importance of the supplier's goods or services to our operations

3. Performance evaluation  Ongoing assessment of the supplier's ability to meet contractual and ethical obligations

Based on this segmentation, suppliers are placed into one of four quadrants:

Platinum Critical suppliers with high business impact

Gold Key suppliers with moderate risk but important relationships

Silver Suppliers with significant spend but low complexity

Bronze Suppliers providing low risk, transactional goods or services

The quadrant-based approach dictates the frequency and depth of our team interactions with our suppliers. This structured engagement serves as a platform to address challenges, explore improvements, and proactively manage risks, including modern slavery risks.

Modern slavery risk in the supply chain

We regularly assess the maturity of our current policies, controls, and remediation mechanisms to confirm that our approach to managing modern slavery risks are appropriate and fit-for-purpose.

We have an Anti-Modern Slavery Strategy and Roadmap (**Strategy**) to keep us accountable and further improve our business practices.

A key part of the Strategy is our Source-to-Contract Roadmap, which includes the implementation of new technology to enhance supplier due diligence assessments. This system has now been implemented and replaces manual pre-qualification checks, and risk assessments, providing greater efficiency and improved supplier risk management.

In addition to supplier segmentation and regular risk assessments, we have adopted a best practice Supplier Relationship Management (**SRM**) Framework. The SRM Framework allows us to take a holistic view of our supplier relationships while also focusing on the key risks associated with modern slavery. It incorporates seven key modern slavery scoring criteria, as outlined opposite.



High risk supplier locations



High risk supplier categories



High risk supplier models



Suppliers employing vulnerable people



Suppliers who have had a prior scrutiny or legal action



Seasonal or sporadic events



Areas of high labour turnover

RISK MANAGEMENT CONTINUED

We regularly engage with suppliers that fall under these priority risk areas. We reiterate compliance expectations outlined in our Supplier Code of Conduct and remind them of our shared responsibility to prevent modern slavery and human rights breaches.

Throughout the year, we engaged LRQA to undertake social audits of key suppliers within the merchandise and technology professional services categories. These suppliers were identified as higher-risk as a result of our risk assessment.

LRQA, a leading provider of sustainability and supply chain services, will conduct these audits using an iteration of the LRQA Responsible Sourcing Assessment standard¹¹ that focuses on service-oriented companies. The scope of the audits may include management interviews, documents and policies review, worker interviews, and visual observation in a process conducted by specialised auditors.

We will disclose the results of these audits in next year's Modern Slavery Statement.

Information technology

Information technology is our largest category of spend and is predominately sourced through Australian based suppliers. However, we understand that modern slavery has been publicly reported to be prevalent in many electronics factories, particularly in Asia, where our suppliers may source these products from.

As we have limited visibility to our suppliers' supply chain and country of origin of these products, we have implemented controls to mitigate this risk. Some of these controls include conducting go to market exercises for major purchases and requiring suppliers to complete modern slavery assessment questionnaires. The responses to these questions are reviewed and assessed for risks of modern slavery by our category specialists. We also seek to purchase from Australian companies, including CompNow, an Australian company which is a signatory of the Australian Government's mandate for large enterprises to eliminate modern slavery from their supply chains.

11. This standard was formerly known as ELEVATE Responsible Sourcing Assessment standard (ERSA). The company previously known as 'ELEVATE' was acquired by leading global assurance partner, LRQA, in April 2022.

12. Murphy, L & Elimä, N 2021, In Broad Daylight: Uyghur Forced Labour and Global Solar Supply Chains, Sheffield Hallam University Helena Kennedy Centre for International Justice.



Aligning Net Zero and anti-modern slavery commitments

The solar panel industry remains high-risk in relation to modern slavery. This is due to the high concentration of global polysilicon production in Xinjiang, China, where there are reported links to forced labour practices¹².

Tabcorp has made a commitment to achieve Net Zero greenhouse gas emissions by 2050, which requires ongoing procurement of renewable energy equipment, including solar panels. We recognise that addressing modern slavery risks is critical to deliver on our sustainability commitments.

In FY25, we completed the procurement of a solar system at our Frenchs Forest facility and assessed both first and second-tier suppliers as part of our due diligence process.

The process involved:

- Inclusion of contractual clauses requiring compliance with anti-modern slavery obligations.
- Supplier self-assessment questionnaire, including modern slavery-related controls.
- Review of relevant policies, codes of conduct, and compliance documentation.
- Supply chain mapping, including origin of solar panels and inputs (solar cells, wafers, polysilicon, quartzite).
- Confirmation of supplier practices against Tabcorp's requirements and expectations.

Looking ahead to FY26, we plan to tender the procurement of solar panels for our Eight Mile Plains site. Modern Slavery risk management will form a key part of the evaluation and contract award process. This will include:

- Requiring all tenderers to disclose their supply chain practices and provide anti-modern slavery self-assessments.
- Assessing tender submissions for evidence of effective controls, policies, and traceability mechanisms.
- Embedding contractual clauses to confirm the successful supplier continues to meet all anti-modern slavery obligations.
- Ongoing supply chain mapping and risk assessment, including upstream inputs such as solar cells, wafers, polysilicon, and quartzite.
- Monitoring supplier compliance through reporting requirements and corrective action obligations.
- Documenting findings and controls as part of our broader ESG and anti-modern slavery reporting commitments.

We believe this approach will help us align procurement of renewable electricity equipment with both our Net Zero and anti-modern slavery commitments.

RISK MANAGEMENT CONTINUED

Facilities management

Modern slavery risks are also more prevalent across categories where there is generally a lower skilled labour force. In our property portfolio, this relates to cleaning, handyman, security and hospitality services, where there has been historical underpayment and overutilisation of these labour resources.

We outsource these services from our principal supplier and work closely with them to manage these risks. Each year, the supplier conducts cleaning and facilities management audits and reviews at both the supplier and contract manager levels, with a focus on auditing high-risk suppliers. To confirm that there are no instances of noncompliance regarding the supply of labour, suppliers are required to acknowledge that they've met the following requirements (as applicable):

- Paying their employees in accordance with the Fair Work Modern Award.

- Adopting the Cleaning Accountability Framework to confirm cleaning employees are properly paid.
- Including compliance with anti-modern slavery requirements in their contractual supplier agreements.
- Utilising leading industry pricing schedule and analytics to confirm that there is no underpayment of employees in the delivery of cleaning services.

As part of our due diligence process, we take several additional actions throughout the service delivery lifecycle – from supplier screening and due diligence before onboarding a new supplier, to contract management and monitoring compliance with our Supplier Code of Conduct. These actions help us to proactively manage risks in the supply chain.

Labour hire

The majority of our team members are professionals working in skilled roles at our corporate offices, warehouses, media facilities, and retail partners' venues. From time to time, we procure labour hire services including to supplement our workforce during peak seasonal events such as the Spring Racing Carnival, when TAB Ambassadors or service centre operators are engaged on a casual basis.

We have risk management processes in place to verify compliance with State Government labour hire licencing schemes, where required. These schemes are designed to bring integrity and scrutiny to the labour hire sector, keep vulnerable workers safe from exploitation and protect them from being underpaid. Under these laws, we must only procure designated labour hire services from licenced providers. Labour hire licences are granted by State based authorities in accordance with strict legislative criteria, which includes a 'fit and proper person' test and regular reporting obligations.

We regularly assess our supply chain to confirm that all relevant suppliers hold an appropriate labour hire licence. Our due diligence process for new suppliers includes labour hire assessment questions to help us verify that relevant new suppliers are appropriately licenced before we engage them. In addition, supplier terms include obligations to maintain appropriate licences as a condition to do business with us.

GRIEVANCE MECHANISMS

Our grievance mechanisms provide structured, accessible, and transparent channels where individuals or communities can raise concerns related to adverse impacts from business operations, such as labour exploitation, or breaches of ethical standards. At Tabcorp, these mechanisms include:



Whistleblower Framework



Respect@Work



Retail Workers Hotline

Whistleblower framework

We have a Whistleblower Policy and framework in place to help us meet our legal and regulatory obligations and to assist anyone who wants to be, and is eligible to be, a whistleblower.

The Whistleblower Policy describes how to make a whistleblower report, who a whistleblower report can be made to, how it will be actioned and investigated, and the protections and support available to whistleblowers under the *Corporations Act 2001* (Cth) legislation. Eligible whistleblowers include current and former directors, officers, related entities, team members, contractors, volunteers and suppliers of Tabcorp. Relatives or dependents of any of the above are also eligible whistleblowers.

Matters can be reported through the Tabcorp Integrity Protection Service (**TIPS**), an independent, anonymous and secure service delivered by Deloitte, or to one of our 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.

All team members are required to complete annual training on our Whistleblower Policy, as part of our Essential Learning program. Our Whistleblower Policy is also regularly communicated to all team members to raise awareness and explain key features such as how to make a whistleblower report and the protections available to whistleblowers.

The whistleblower program provides a source of continuous learning based on engagement and dialogue. These learnings help us improve our program and prevent future grievances and harms.

Our Whistleblower Committee received a total of 15 reports during the reporting period, which were assessed and managed in accordance with our Whistleblower program. None of these reports related to potential modern slavery or human rights risks in our operations or supply chain.

Our Whistleblower Policy and information about our TIPS program are available on our website at www.tabcorp.com.au/company/corporate-governance.

GRIEVANCE MECHANISMS CONTINUED

Respect@Work

We're committed to providing a workplace free from sexual harassment, sex-based harassment, discrimination and other inappropriate behaviour. This commitment has been documented in our Respect@Work Position Statement. Our approach to Respect@Work is underpinned by our Code of Conduct.

We continue to work diligently to meet our Respect@Work obligations. This work includes taking positive steps to address each of the seven standards highlighted in the Australian Human Rights Commission framework: leadership; risk assessment and transparency; culture; knowledge; support; reporting; and measuring.

This year, we launched a new Respect@Work Anonymous Reporting Portal, an additional resource to strengthen our efforts in addressing inappropriate workplace behaviour. The portal is administered by Deloitte and provides team members with a confidential and secure platform to raise concerns about unreasonable sex-based behaviours, enabling them to feel heard and supported.

Key features of the Anonymous Reporting Portal:

Confidentiality – team members can make a report without revealing their identity

Access – the reporting line is available 24/7 via an online platform

Support – all reports are handled sensitively, with timely and appropriate follow-up actions

We received three reports during FY25 through our Respect@Work Anonymous Reporting Portal. The reports related to allegations of sexual harassment and inappropriate behaviour. Each of these reports was investigated and closed.

Our Respect@Work Position Statement is available on our website at www.tabcorp.com.au/company/corporate-governance.

Retail Workers Hotline

We have established a dedicated Retail Workers Hotline, managed independently by Deloitte, to enable our retail partners' employees to anonymously report suspected noncompliance or concerns regarding their workplace entitlements. Retail partners and their employees can access the service and make a disclosure via:



A 1800 free call number available to receive calls from Monday to Friday, between 6.30am to 5.00pm (excluding all Victorian public holidays).



A dedicated website with information about the service and how retail partners' employees can make a disclosure.

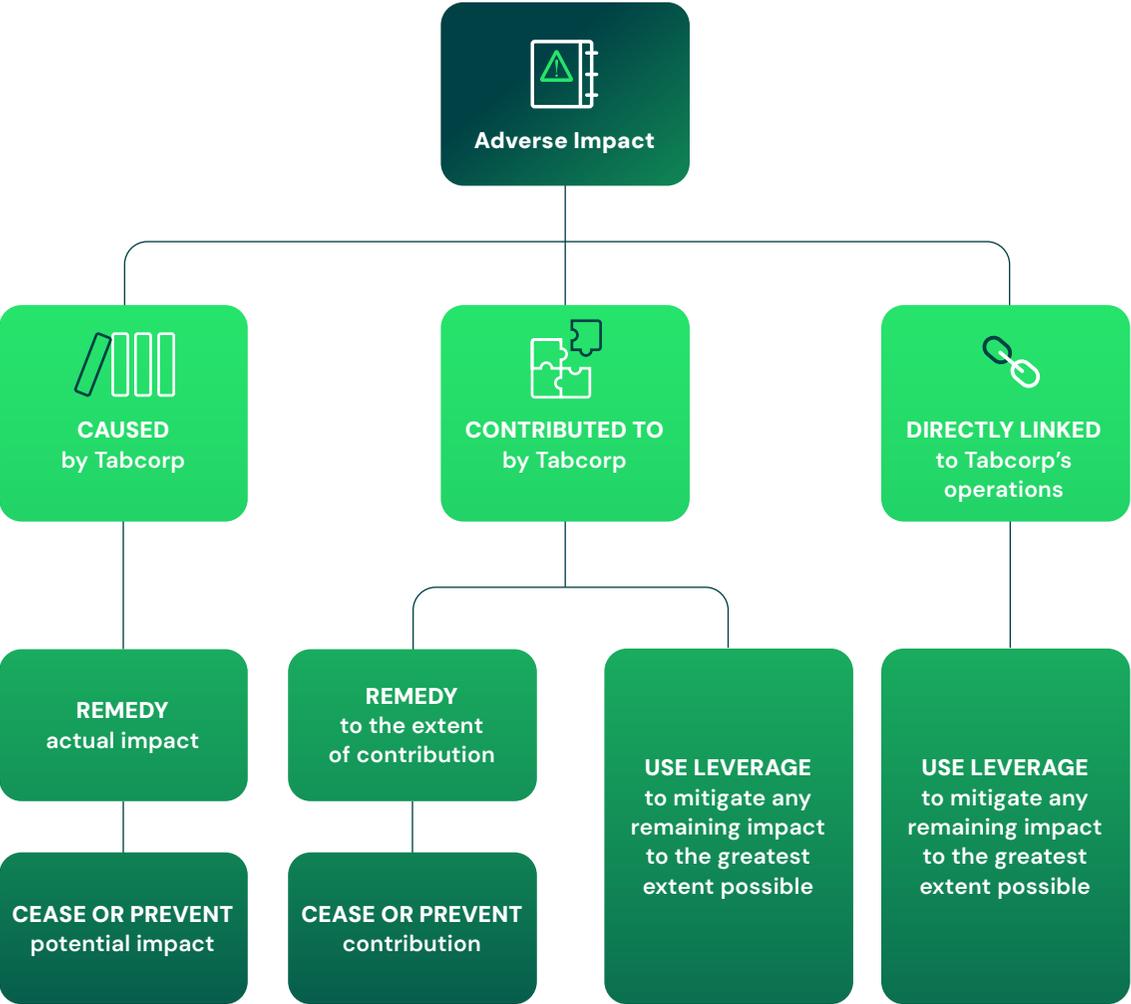
We didn't receive any reports during FY25 through our Retail Workers Hotline.

REMEDIATION

We work with our suppliers to enhance their understanding and check compliance with our expectations regarding modern slavery and human rights standards.

If we identify a potential modern slavery risk in relation to a supplier, we seek further information and work collaboratively with them to either mitigate or remove that risk.

If modern slavery is identified, we will immediately take corrective actions. We use the following guidance from the United Nations Guiding Principles on Business and Human Rights when determining how to respond to potential or actual adverse impacts:



We did not identify any instances of modern slavery within our operations and our supply chain during FY25.



Supporting survivors

As part of our commitment to human rights and ethical business practices, we recognise the important role businesses play in supporting survivors of modern slavery.

Beyond taking steps to prevent exploitation in our operations and supply chains, we seek to create pathways for survivor recovery and reintegration. This includes supporting specialist organisations that provide trauma-informed employment opportunities, access to support services, and safe working environments, such as The Freedom Hub.

The Freedom Hub is a registered charity that empowers survivors of modern slavery to rebuild their lives and train for lasting employment. Through their Survivor School, employment pathways, and ethical business initiatives, they provide real tools for long term freedom.

By adopting a survivor-informed approach, we aim to foster long term resilience and contribute to systemic change. Our efforts reflect a broader responsibility to uphold dignity, equity, and justice across all aspects of our business.

Further information can be found at www.thefreedomhub.org.

CAPABILITY BUILDING

Building internal capability is essential for effectively identifying, addressing, and preventing modern slavery risks across our business operations and supply chains. This involves equipping our teams with the knowledge, tools, and confidence to recognise indicators of exploitation, respond appropriately, and embed human rights due diligence into everyday decision-making.

Through targeted training, cross-functional collaboration, and partnerships with experts and survivor-led organisations, we can strengthen our ability to act ethically and responsibly.

Capability building also supports continuous improvement, so that our response to modern slavery can evolve with emerging risks and global best practices.

During FY25, we enhanced our capabilities as follows:

- Delivered 'Speak Up & Do What's Right' Essential Learning module to all relevant team members across our business.

- This module provides an overview of what modern slavery is and outlines the centralised processes to consistently identify, assess and escalate human rights or modern slavery complaints or concerns. Relevant team members are required to complete the module every year, as part of their regular mandatory Essential Learning cycle. New starters are also required to complete the module as part of the onboarding process.
- Continued to engage and collaborate with several stakeholders through various channels to address modern slavery, improve our knowledge and leverage best practice reporting, as outlined in the Stakeholder Engagement section.
- Participated in a consultation session with the Anti-Slavery Commissioner regarding the Commissioner's strategic plan for the upcoming three-year period. The session, facilitated by the UNGCNA, provided valuable insights on the current landscape for modern slavery, key challenges for business and policy and compliance focus areas for the Commissioner.

- Uplifted our supplier due diligence capabilities, leveraging advanced technology to enhance our supplier risk assessment process.
- Continued to engage with industry partners and associations on a regular basis regarding our Fair Work Compliance program. This engagement helps us provide holistic guidance and support to our retail partners in the administration of their employment obligations.
- Provided Modern Slavery training materials to our suppliers, as part of the self-registration and Modern Slavery assessment process. The training is designed to strengthen their awareness and understanding of modern slavery risks, compliance expectations, contractual obligations, and Tabcorp's escalation process.

EFFECTIVENESS

We continuously evaluate the effectiveness of our efforts to identify and manage modern slavery risks. This includes tracking our actions and outcomes, collaborating closely with suppliers and external partners, and undertaking regular internal governance and program reviews. To further strengthen our approach, we may also engage independent experts to provide external assessments of our disclosures and practices, to improve transparency and drive continuous improvement.

Some of the key performance indicators (KPIs) we use to assess the effectiveness of our actions include:

KPI	Outcome
Number of modern slavery training and awareness raising programs delivered	During the reporting period 1 training program delivered: <ul style="list-style-type: none"> • ‘Speak Up & Do What’s Right’ Essential Learning module to all team members across our business
Number of team members that completed training on modern slavery	All relevant team members across the business: 2,717 as at 30 June 2025. This represented a 99.9% completion rate. Current team members are required to complete training annually within 60 days from February. New starters have 30 days to complete it
Number of grievances raised with modern slavery indicators	0
Contracts that include modern slavery clauses	Our template procurement agreements include modern slavery clauses. Where we negotiate an agreement based on supplier terms, we ask them to include appropriate coverage of modern slavery obligations
Number of modern slavery cases identified	0
Number of audits and outcomes	<ul style="list-style-type: none"> • Fair Work self-audit program: completed annual audit with 124 retail partners. 10 instances identified where further action was required. These related to: agent knowledge/processes regarding superannuation payments; records management; employee entitlements (including allowances, reimbursements, deductions, break and leave provisions); employment of family members; modern award/industrial agreement; wages payment type; and modern slavery reporting requirements. These have been addressed and closed out • Independent third party audits: engaged a third party to audit key suppliers. These audits are scheduled for FY26 and an update will be provided in our next Modern Slavery Statement
Number of tenders including modern slavery risk as a key criteria in supplier selection and qualification	22
Supplier compliance with modern slavery qualification or due diligence requirements	<ul style="list-style-type: none"> • 73% supplier compliance through our online portal, reflecting our suppliers’ alignment with Tabcorp’s expectations on ethical and responsible practices • The remaining 27% compliance was achieved through a manual process, pre-online registration implementation
Number and value of contracts terminated by Tabcorp due to modern slavery	0
External ratings	Received an ‘A’ rating from Monash University for the quality of our FY23 Modern Slavery Statement, in their report released in November 2024

We will continue to review and enhance these KPIs to assess the effectiveness of our actions, in line with continuous improvement principles.

FUTURE PRIORITIES

In the next financial year, we will continue strengthening safeguards to support meaningful change across our operations and supply chains. Our key priorities are to:

- Complete independent audits on key high risk suppliers to verify compliance with our social requirements, in line with our Supplier Code of Conduct.
- Review and prioritise actions in our Anti-Modern Slavery Strategy and Roadmap, to better align with our new risk assessment scoring, risk appetite and internal resources.
- Continuously improve our due diligence procedures designed to manage modern slavery risks in our supply chains.
- Review existing controls to identify and mitigate modern slavery risks at TAB Agencies, licensed venues and international operations (PGI and Sky Racing World).
- Review and update our mandatory modern slavery training for all team members.

REPORTING ENTITIES

The following Tabcorp entities are considered Reporting Entities under the Act in respect of FY25 and are covered by this Statement.

Key brands	Reporting Entity	ABN	Principal activity
Tabcorp	Tabcorp Holdings Limited	66 063 780 709	The ultimate holding company of the Group, which is publicly listed on the Australian Securities Exchange
	Tabcorp Assets Pty Ltd	73 064 303 920	The primary employing entity and contracting party for procuring goods and services for the Group
	Tabcorp Finance Pty Ltd	74 108 197 084	Facilitates the Group's financing activities and is a holding company for some of the Group's wagering and media operations
	Tabcorp Wagering Holdings Pty Ltd	83 138 672 581	The holding company for wagering in Victoria
	Tabcorp VIC Pty Ltd	95 668 057 056	Operates wagering in Victoria from 16 August 2024
	Tab Limited	17 081 765 308	Operates wagering in New South Wales
	UBET QLD Limited	84 085 691 738	Operates wagering in Queensland
 	Tabcorp Maxgaming Holdings Limited	19 108 686 040	The holding company for gaming services and some wagering operations
	Maxgaming Holdings Pty Ltd	86 079 909 541	The intermediate holding company for gaming services operations
	Tabcorp International No. 4 Pty Ltd	41 146 788 614	The holding company for the Premier Gateway International business located in Isle of Man
	Sky Channel Pty Ltd	77 009 136 010	Operates television and radio broadcasting services
 	Tabcorp International Pty Ltd	26 006 574 652	The holding company for the Group's non-Australian operations

CONSULTATION AND APPROVAL PROCESS

We prepared this Statement through a collaborative and consultative process.

Our Governance and Sustainability team led the development of this Statement, with the input from our Modern Slavery SteerCo. The SteerCo consists of representatives across relevant functions within our business who meet regularly to discuss and align on the risks and activities taking place within our operations and supply chain, as detailed in this Statement.

The consultation process across the Group and its Reporting Entities included engagement with members of senior management heading every relevant function within Tabcorp, the Executive Leadership Team and the Directors of the Reporting Entities within the Group as at the date of this Statement.

STATEMENT ANNEXURE

Principal governing body approval

This Statement was approved by the Board of Directors of Tabcorp Holdings Limited, being the principal governing body as defined by the Act, on behalf of all Reporting Entities specified in this Statement on 9 December 2025.

Signature of responsible member

This Statement is signed by a responsible member of the Tabcorp Holdings Limited Board of Directors, as defined by the Act.



Brett Chenoweth
Chair

Mandatory criteria reference table

The following table indicates the page numbers of the Statement where each of the mandatory criteria in section 16 of the Act is addressed.

Mandatory criteria	Page number
a. Identify the reporting entity	2
b. Describe the reporting entity's structure, operations and supply chains	4-6
c. Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls	13-16
d. 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	17-24
e. Describe how the reporting entity assesses the effectiveness of these actions	26
f. Describe the process of consultation on the development of the Statement with any entities the reporting entity owns or controls (a joint statement must also describe consultation with the entities covered by the Statement)	27
g. Any other information that the reporting entity, or the entity giving the Statement, considers relevant	7-12

Forward-looking statements

This Report contains forward-looking statements (**Statements**) in relation to Tabcorp and its controlled entities (**Group**). This includes Statements regarding the Group's intent, belief, goals, objectives, opinions, initiatives, commitments, or current expectations with respect to the Group's business and operations, market conditions, results of operations and financial conditions, and risk management practices.

Examples of these Statements include words such as 'estimate', 'plan', 'will', 'anticipate', 'may', 'believe', 'should', 'expect', 'intend', and other similar expressions.

Any Statements are based on the Group's current knowledge and assumptions, including financial, market, risk, regulatory and other relevant environments that will exist and affect the Group's business and operations in the future. The Group does not give any assurance that the assumptions will prove to be correct.

These Statements involve known and unknown risks, uncertainties and assumptions that could cause the actual results, performances or achievements of the Group to be materially different from the relevant Statements.

We caution readers not to place undue reliance on these Statements. Except as required by applicable laws or regulations, the Group does not plan to publicly update, review, or revise any of the Statements or to advise of any change in assumptions on which any such Statement is based.

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Feedback

To ask questions or provide feedback about this Statement and our practices regarding human rights and addressing modern slavery, please email sustainability@tabcorp.com.au.