



# WE'RE RAISING THE GAME

# 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, present and emerging.

Tabcorp commissioned this digital artwork by Ngarraindjeri Indigenous artist Jordan Lovegrove of Dreamtime Creative to mark Tabcorp's commitment to NAIDOC Week 2022. The artwork represents Tabcorp combining its deep experience with embracing new horizons and ways of working together, with the large central meeting place symbolising Tabcorp while the bottom left section represents its history, and the smaller meeting places depict coming together to find new ways forward, while the right section is the present and future which is bright and fresh.

## INTRODUCTION

This Modern Slavery Statement (**Statement**) covers the activities of Tabcorp Holdings Limited (ABN 66 063 780 709) and 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 in respect of the financial year ended 30 June 2022 (**FY22**) in identifying and addressing the potential risk of modern slavery and human trafficking in our operations and supply chain. As of 1 June 2022 (**Transaction Date**), Tabcorp Holdings Limited demerged its Lotteries and Keno business (**Demerger**), creating The Lottery Corporation Limited (ABN 21 081 925 706) and its subsidiaries (**Demerged Entities**). As of the Transaction Date, the Demerged Entities are no longer owned by Tabcorp Holdings Limited. As the Lotteries and Keno business formed part of the Group during the reporting period (from 1 July 2021 to 31 May 2022), this Statement also covers the activities of the now demerged Lotteries and Keno business up until the Transaction Date.

Refer to page 21 for the list of Tabcorp entities that are considered reporting entities under the *Modern Slavery Act 2018 (Cth)* (**Act**). Tabcorp makes this joint Statement on behalf of itself and these reporting entities as well as all other entities owned or controlled by Tabcorp Holdings Limited.



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.

# CONTENTS

CEO message	3
About Tabcorp	4
Demerger	7
Our values	7
Sustainability framework	8
FY22 highlights	9
Governance	10
Policy framework	11
Stakeholder engagement	12
Risk identification	13
Risk management	13
Tabcorp's operations	14
Tabcorp's supply chain	15
Grievance mechanisms	18
Remediation	19
Capacity building	19
COVID-19 response	20
Effectiveness	20
Future priorities	21
Reporting entities	21
Consultation and approval process	22
Statement annexure	22

# CEO MESSAGE



**Adam Rytenskild**

Managing Director and  
Chief Executive Officer

Our people are one of our greatest strengths and assets. We aim to provide them with a safe, fair, inclusive and welcoming workplace, and offer them the resources and support they need to succeed. Our suppliers are our business partners, and we expect them to do the right thing by also respecting their people and treating them with fairness and dignity.

Modern slavery is a severe abuse of human rights and a significant issue within global supply chains.

We recognise we have an important role to play in the daily lives of many people, including our customers, our team members, our suppliers, supply chain workers and the communities in which we operate. To this end, we are committed to ethical, sustainable and socially responsible business practices, and safeguarding the rights of our team members and workers in our supply chains.

FY22 was another challenging year with COVID-19, natural disasters and international political unrest disrupting our business and supply chains. Despite these challenges, and the added complexities of the Demerger of our Lotteries and Keno business, we continued

to make good progress towards our goal of being a leader in sustainability in our industry. Respecting human rights and standing against modern slavery is integral to achieving this goal.

During the year we continued to identify and address modern slavery risks in our operations and supply chain, and improved our business practices, as outlined through this Statement.

We are pleased with the progress we have made but recognise the need to keep improving. We know every business has a part to play, and we are committed to making real positive change on these issues.

A handwritten signature in black ink, appearing to read 'Adam Rytenskild', written in a cursive style over a light blue background.

**Adam Rytenskild**

Managing Director and Chief  
Executive Officer  
6 December 2022

# ABOUT TABCORP

Tabcorp operates market-leading wagering, media and gaming businesses. We have national scale and reach across Australia with our leading TAB, Sky Racing and MAX brands, and international wagering and broadcasting operations through Sky Racing World and Premier Gateway International (PGI).

3,400+

Team members

1,820

Suppliers and contractors

## Wagering and Media



783,000

Active registered TAB customers

4,000+

Wagering retail venues

## Gaming Services



3,500+

Venues serviced

85%

of Australian EGMs serviced<sup>(ii)</sup>

(i) Data as at 30 June 2022 or in respect of FY22, as applicable.

(ii) Based on total number of electronic gaming machines (EGMs) that MAX provides at least one product or service to.

## WE ARE THE BIG AUSTRALIAN PLAYER

### Broad national footprint across Australia

TAB is one of the most recognised wagering brands in Australia. Customers can wager with TAB anywhere in Australia online and by phone, and in more than 4,000 retail venues including pubs, clubs, agencies and on-course (except Western Australia).

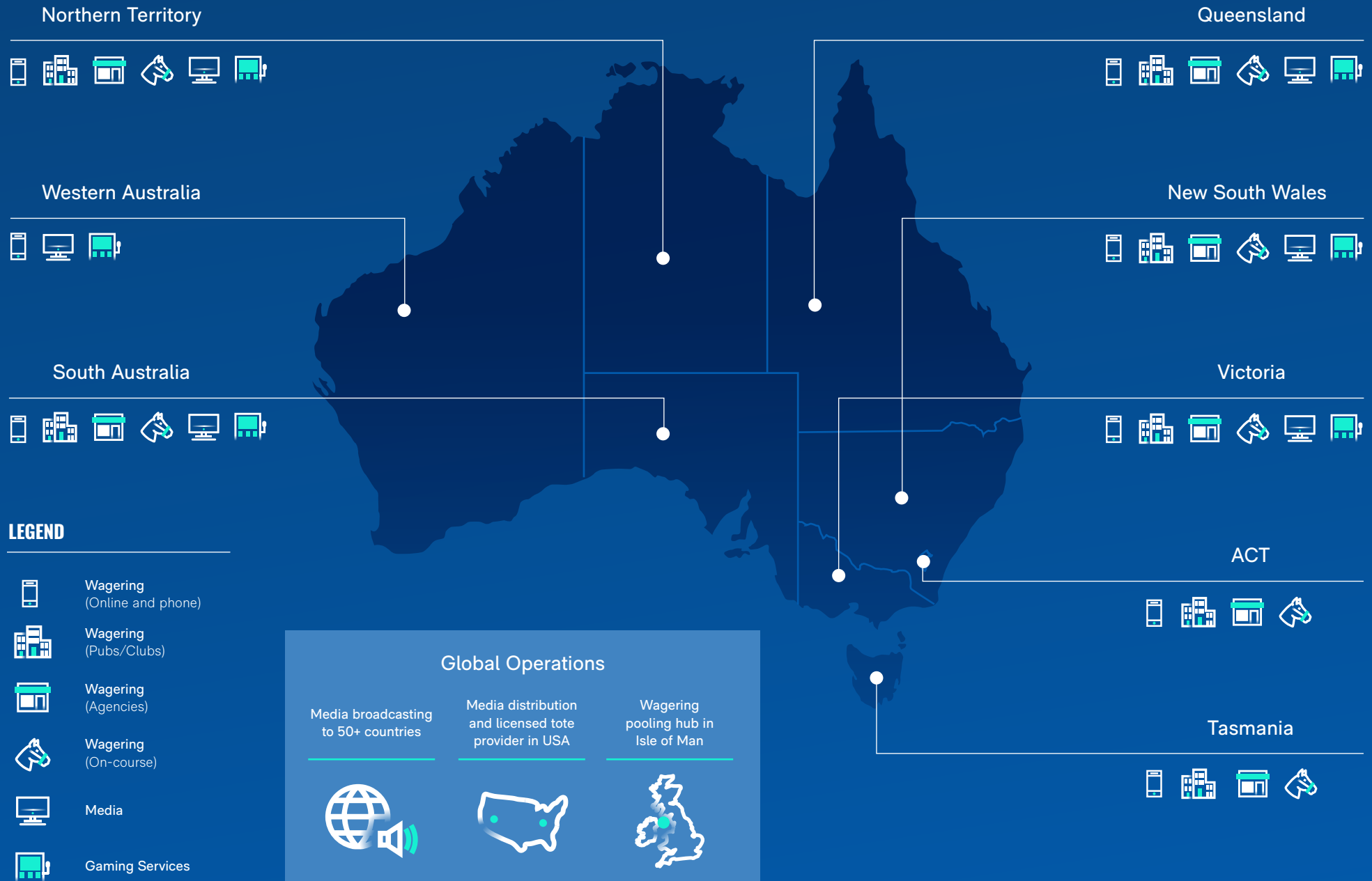
Our Sky Racing business provides racing and sports vision to 4,875 venues across Australia and over pay TV and various digital platforms.

Our Gaming Services business provides regulatory monitoring and related services across New South Wales (**NSW**), Queensland and Northern Territory, and in-venue EGM services across more than 3,500 venues in NSW and Victoria, as well as other technology and value-added venue services in NSW, Victoria, Queensland, Western Australia, South Australia, Tasmania, Australian Capital Territory (**ACT**) and Northern Territory.

### Complementary international businesses

Our domestic Wagering and Media business is complemented by Sky Racing World, a US-based international racing content distributor and facilitator of associated tote pools, and Premier Gateway International (**PGI**), one of the largest global tote hubs based in Isle of Man.





# DEMERGER

Tabcorp successfully implemented the Demerger of its former Lotteries and Keno businesses on 1 June 2022. Following the Demerger, Tabcorp operates two businesses: its Wagering and Media business; and its Gaming Services business. Tabcorp's former Lotteries and Keno business is now operated by The Lottery Corporation Limited (ASX code 'TLC').

This Statement covers the activities of the now demerged Lotteries and Keno business for the eleven month period up to the implementation of the Demerger.

The demerged Lotteries and Keno business had the following operations as at 31 May 2022:

- The Lott – Australia's leading licensed lottery business with operations in all states and territories of Australia, except Western Australia.
- Keno – a social lottery-style game that is played in licensed clubs, hotels and TABs in certain Australian states and territories.

# OUR VALUES

At Tabcorp, every one of our people plays a role in bringing the excitement and integrity of our company to life. We are raising the game in our industry through the impact we make together, leading the way as one through our shared values.



## DO IT AS ONE TEAM

We are stronger together. We are inclusive, collaborative and know that amazing ideas can come from anywhere



## DO THE RIGHT THING

We always act with integrity, standing up (and speaking out) for what's right



## EXPLORE WHAT'S POSSIBLE

We listen. We think big. We ask 'what if'. Our curiosity for what's next will shape tomorrow



## CREATE AWESOME MOMENTS

We all have the power to delight and inspire, so let's dial up the excitement and create awesome moments



## MAKE A DIFFERENCE

We're passionate and proud about making a real change for customers, and benefiting our communities















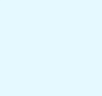
# SUSTAINABILITY FRAMEWORK

Sustainability is at the heart of our business operations and our vision of **Raising the Game**. Our mission is to deliver experiences safely and responsibly and set the benchmark for sustainability in our industry.

We believe that respecting human rights and standing against modern slavery is critical to our vision of **Raising the Game** and delivering long-term shareholder value. Not to mention, it's the right thing to do.

Our commitment to respecting and contributing to the realisation of the human rights of all people impacted by our operations and business relationships is reflected in our Sustainability Framework.





Our detailed ESG approach and performance will be disclosed in our 2022 Sustainability Report which will be available at [www.tabcorp.com.au](http://www.tabcorp.com.au)

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



# FY22 HIGHLIGHTS

Our key achievements since the beginning of the reporting period include:

 <h2>EXTERNAL ALIGNMENT</h2>	<ul style="list-style-type: none"><li>• Became a participant of the United Nations Global Compact (<b>UNGC</b>), a voluntary leadership platform for the development, implementation, and disclosure of responsible business practices</li><li>• Joined the UNGC Network Australia (<b>UNGCNA</b>) Modern Slavery Community of Practice, a forum facilitated by the UNGCNA, where Australian business participants can connect, navigate new developments, and share learnings regarding modern slavery</li></ul>
 <h2>GOVERNANCE</h2>	<ul style="list-style-type: none"><li>• Launched a new Sustainability Framework and established a new governance structure to oversee the management of sustainability focus areas, including responsible procurement and modern slavery</li><li>• Established a new cross-functional Modern Slavery SteerCo to support our Sustainability Framework, enhance our practices related to human rights and better address modern slavery risks</li><li>• Developed a Responsible Procurement Plan for Modern Slavery, in consultation with key internal stakeholders</li><li>• Shortly after the end of FY22, we reviewed and enhanced our Supplier Code of Conduct, to keep pace with stakeholders' expectations and best practice</li></ul>
 <h2>OPERATIONAL</h2>	<ul style="list-style-type: none"><li>• Created a Source to Contract (<b>S2C</b>) Procurement roadmap, that includes uplifting supplier due diligence capabilities by implementing new technology to enhance the supplier risk assessment processes. Once implemented, this new technology will replace current manual supplier pre-qualification checks and risk assessments</li><li>• Created Category Strategies that identify high risk suppliers and demographics of suppliers, size of spend and category of the goods and services</li></ul>
 <h2>TRAINING AND AWARENESS</h2>	<ul style="list-style-type: none"><li>• Created a stand-alone 'Modern Slavery' Essential Learning module for our team members. This module outlines the centralised processes to consistently identify, assess and escalate any human rights or modern slavery complaints or concerns. Team members have until the end of the year to complete the module, as part of their regular mandatory Essential Learning cycle</li><li>• Delivered tailored awareness based Modern Slavery training for all members of our Procurement team</li></ul>

# GOVERNANCE

Our corporate governance arrangements to address human rights and modern slavery issues are core to our vision of **Raising the Game** and our mission to set the benchmark for sustainability in our industry.

Our Executive and Board Risk, Compliance and Sustainability Committees are responsible for overseeing our Sustainability Framework, which includes our response to modern slavery risks. Outcomes are reported regularly through these Committees, and annually in this Statement. A summary of our governance framework is outlined below.

<b>BOARD</b>	Responsible for overseeing our response to modern slavery risks and reviewing and approving our Modern Slavery Statement. Delegates authority to the Board Risk, Compliance and Sustainability Committee to review and monitor material business risks, subject to the Board's ultimate accountability and oversight	
<b>BOARD RISK, COMPLIANCE AND SUSTAINABILITY COMMITTEE</b>	Responsible for overseeing delivery of the Sustainability Framework, including management of human rights and modern slavery issues, together with Tabcorp's risk and compliance framework. Engages with other Board Committees, such as the People and Remuneration Committee	
<b>MANAGEMENT OVERSIGHT</b>	<b>CEO and Executive Leadership Team</b> Accountable for managing modern slavery risks and the overall implementation of our Sustainability Framework	<b>Supported by the Executive Risk, Compliance and Sustainability Committee</b>
<b>COORDINATION AND REPORTING</b>	<b>Governance and Sustainability team</b> Responsible for developing the Sustainability Framework, supporting the preparation of the Responsible Procurement Plan for Modern Slavery, tracking progress, and coordinating the preparation of our Modern Slavery Statement	<b>Supported by the Modern Slavery SteerCo</b>
<b>EXECUTION</b>	<b>Business and functional units</b> Responsible for executing the Responsible Procurement Plan for Modern Slavery, identifying and managing modern slavery risks, and reporting progress	<b>Supported by policies and procedures, as approved by the Executive Leadership Team and the Board</b>

(i) Structure effective post-Demerger.

# POLICY FRAMEWORK

Tabcorp has a number of policies and codes in place that support our governance framework to address modern slavery in our operations and supply chain. They are periodically reviewed and updated, with oversight from our Executive Leadership Team, Board of Directors and its committees, as detailed in the table below.

Policy/Code	Description
<b>Tabcorp Code of Conduct</b>	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. It includes practical guidance for team members about how to access support and report if they experience or witness behaviour not aligned with the Code
<b>Supplier Code of Conduct</b>	Outlines the expectations we have of our suppliers across six areas: <ul style="list-style-type: none"> <li>• Integrity, ethics and corporate conduct</li> <li>• Corporate governance</li> <li>• Labour and human rights</li> <li>• Privacy and cyber security</li> <li>• Health, safety and wellbeing</li> <li>• Environmental management</li> </ul>
<b>Human Rights Policy</b>	Formalises our commitment to respecting the human rights of the people we interact with and who are impacted by our business operations and relationships
<b>Whistleblower Policy</b>	Describes the process for making and investigating a disclosure, in line with applicable whistleblower protection legislation. It applies to current and former team members, Directors, contractors and suppliers, including employees of contractors and suppliers
<b>Inclusion and Diversity Policy</b>	Sets out our commitment to a culture of inclusion and the creation of a bias free workplace where all are welcomed and respected
<b>Workplace Health, Safety and Wellbeing Policy</b>	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 by providing resources that reinforce healthy lifestyle choices
<b>Talent Acquisition Policy</b>	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
<b>Procurement Policy</b>	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
<b>Anti-Money Laundering and Counter-Terrorism Financing Policy (AML/CTF)</b>	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
<b>Anti-Bribery and Corruption Policy</b>	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
<b>Sanctions Policy</b>	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

A number of these policies are available from the Tabcorp website at [www.tabcorp.com.au/company/corporate-governance](http://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 of the Statement.

# STAKEHOLDER ENGAGEMENT

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

Tabcorp engages with several stakeholders in addressing modern slavery risks.

We conduct vendor governance meetings with strategic, tier one suppliers on a monthly or quarterly basis. Relevant risks, including modern slavery updates and information sharing, are all addressed in these meetings.

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

To increase our understanding of human rights risks and leveraging best practice, our Procurement team utilise their membership with Procurement Leaders to gain access to modern slavery information, including risk reporting, case studies, guides, virtual networking groups, supply chain risk mitigation webinars and leadership panels that share insights of what other organisations and peers are doing in relation to modern slavery and human rights issues.

## OUR STAKEHOLDERS



## RISK IDENTIFICATION

We identify and assess potential risks of modern slavery in our supply chain by actively reviewing country, product, service, and industry risk indicators as provided by expert organisations such as the International Labour Organization (ILO), and the Global Slavery Index. We also take into consideration high risk business models and suppliers that engage and/or employ vulnerable people. Examples of relevant risk factors identified through this process are outlined below.

Our team has a strong understanding of the factors that contribute to the risks of modern slavery. For example, they proactively analyse and identify risk areas in our supply chain where modern slavery may exist. These areas include labour hire arrangements, as well as direct and indirect procurement of goods, especially goods for end use (eg. uniforms, computer/electronic equipment, etc). Products such as electronics require a high level of labour to produce, and in many instances this production only takes place

in countries which are classified as high risk. Many of the countries our suppliers source those products from do not have a strong rule of law in respect of human rights and therefore, reliance on compliance with local legal requirements alone is inadequate to mitigate modern slavery risks. We know that modern slavery is a symptom of wider human rights vulnerabilities, and we are constantly working to alleviate adverse impacts, as detailed in the next sections of this Statement.

<p><b>Retail agencies and licensed venues</b></p>	<p>Retail partners may employ migrant workers, people in financial hardship, and underage workers to deliver services related to TAB</p>
<p><b>Industry partners</b></p>	<p>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</p>
<p><b>Labour hire/ services</b></p>	<p>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 technology subcontractors</p>
<p><b>Direct and indirect sourcing of goods</b></p>	<p>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</p>

## RISK MANAGEMENT

Tabcorp's Risk Management Framework, policies and procedures set out the roles, responsibilities, and guidelines for managing financial, operational, and other risks associated with our business, including human rights and modern slavery risks. The Framework enables the identification, evaluation, monitoring, management, reporting and oversight of risk throughout the Group. When assessing modern slavery risks, we focus on labour risk to people, not just risk to Tabcorp.

Risk assessments of modern slavery in our operations and supply chains consider the risk that we are causing, contributing, or directly linked to modern slavery practices.

Human rights and modern slavery risk identification and management information is reported to both the Executive and Board Risk, Compliance and Sustainability Committees. In turn, the Board Risk, Compliance and Sustainability Committee reports to the Board of Directors. All team members are responsible for managing these risks, including senior managers in Tabcorp's Procurement, People and Culture, and Legal teams.

After the Demerger, we established a new cross-functional Modern Slavery SteerCo comprising senior managers from our Procurement, People and Culture, Legal, Risk and Sustainability teams to better align with our refreshed Sustainability Framework. The SteerCo is sponsored by our Chief Legal and Risk Officer and oversees the implementation of our Responsible Procurement Plan for Modern Slavery, under our Sustainability Framework. The main purpose of this Plan is to enhance our practices related to human rights and better address modern slavery risks.

# TABCORP'S OPERATIONS

As of 30 June 2022, Tabcorp employs or engages 3,404 people, of which 1,089 are casual and 210 are contractors. The remaining 2,105 are directly employed team members (permanent/fixed term). Team members are either covered by enterprise/collective agreements (1,211) or have individual employment contracts.

We also engage 1,036 people through third parties. These are vendor resources in professional roles, such as marketing and technology, and are not included in our team member headcount.

We are committed to complying with all applicable laws and regulations with respect to wages, working hours, leave entitlements, superannuation and workers' compensation insurance. We undertake an annual minimum wage review across all our operations to confirm that our team members are compensated fairly and in accordance with relevant awards or enterprise/collective agreements, where applicable.

Tabcorp has reviewed its operations regarding our provision of labour to other organisations and has assessed and taken steps to address any potential risks. Details are outlined in the next section.


## Fair Work Retail Compliance Program

We provide our services online and through a network of agencies (**retail partners**) across Australia.

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

### STEP ONE: Set expectations

The terms of our contractual agreements with retail partners specify the requirement to comply with workplace laws and Tabcorp's right to audit and access records, where required. Our Operations Manual and other written commitments detail our expectations to comply with workplace laws.

 Permanent/ fixed term team members*	 Casual team members*	 Contractors*	 Covered by enterprise/ collective agreements*	 People hired through third parties
2,105	1,089	210	1,211	1,036

Data as of 30 June 2022 (post-Demerger).  
\* Refers to team members directly employed by Tabcorp

### STEP TWO: Educate and train

We offer targeted in-house and publicly available training, 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. We also publish a quarterly series of educational communications to our retail network on key obligations and trends identified through our monitoring activities.

### STEP THREE: Monitor compliance

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 employee 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 their workplace entitlements.

### STEP FOUR: Take further action

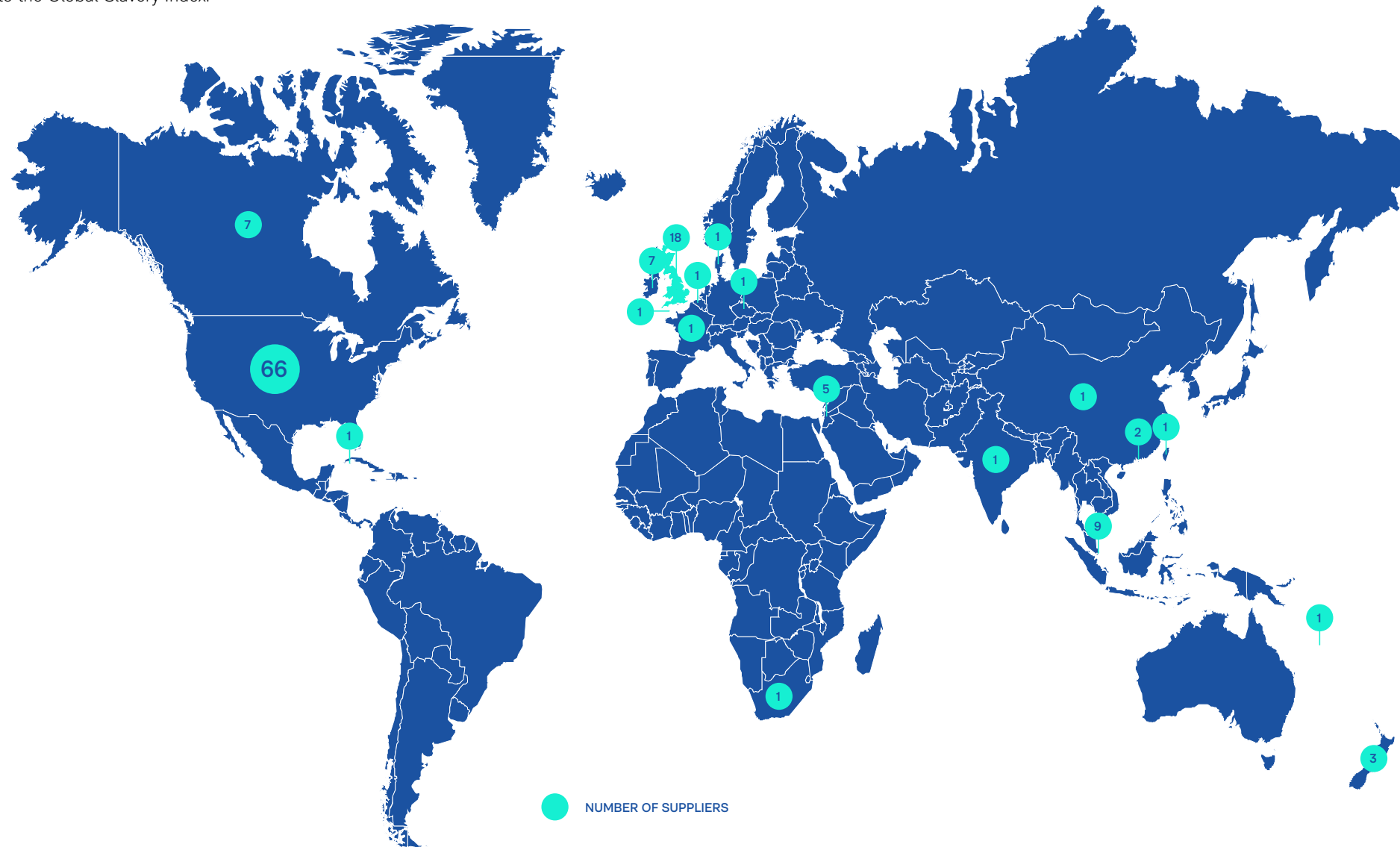
We have developed a process and governance framework to respond to known or suspected noncompliance in our retail network. Our approach is to work collaboratively with retail partners to confirm understanding of our requirements and promote compliance with the Fair Work Act. If we are unable to reach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

During FY22, Tabcorp has not identified any material breaches of the Fair Work Act.

# TABCORP'S SUPPLY CHAIN

In FY22, Tabcorp engaged directly with over 1,820 suppliers and contractors. Approximately 85% of Tabcorp's FY22 total spend was with 119 suppliers. Our largest category of spend was information and communication technology at 28.7%. This includes items used to develop and manage our systems, hardware and software purchases and purchases within our gaming business. The remaining 71.3% of procurement spend was on activities including property, recruitment and professional services, travel and consumables.

9.14% of total FY22 spend was with 136 international suppliers and 92.7% of this spend was with suppliers based in countries deemed as low or medium risk for modern slavery according to the Global Slavery Index.



## TABCORP'S SUPPLY CHAIN CONTINUED

Country	Product or service category	Country Risk*	Number of Suppliers
United States of America	IT, Marketing and Sponsorship	Low	66
United Kingdom	Gaming, Marketing and Sponsorship and Professional Services	Low	18
Singapore	Marketing and Sponsorship and Professional Services	Low	9
Ireland	IT	Low	7
Canada	Machines, Print, Production and Distribution	Low	7
Israel	IT	Low	5
Switzerland	Market Intelligence	Low	4
Sweden	IT and Production	Low	3
New Zealand	IT	Low	3
Hong Kong	IT	Low	2
India	IT	Medium	1
France	Gaming maintenance	Low	1
South Africa	IT	Medium	1
Belgium	Subscriptions and Memberships	Low	1
Taiwan	Gaming maintenance	Low	1
Cayman Islands	Marketing and Sponsorship	Medium	1
China	Machines and screens	Medium	1
Papua New Guinea	Marketing and Sponsorship	Medium	1
Vanuatu	Subscriptions and Memberships	Low	1
Denmark	IT	Low	1
Czechia	IT	Low	1
Guernsey	Professional Services	Low	1

\* Low risk refers to countries with prevalence estimates for all forms of modern slavery (except state imposed forced labour) of 1.0 or more per 1,000 population, as rated by the **Global Slavery Index**.



## Supplier risk management and due diligence

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

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

In April 2020, Tabcorp engaged an external consultancy (KPMG) to undertake a modern slavery risk assessment and segmentation of our supply chain. This assessment prioritised our direct suppliers, based on four risk levels:

1. **High Risk Locations** (Relevant guidance from Trafficking in Persons Report (TIP) 2019, Global Slavery Index (GSI) 2018);

2. **High Risk Categories** (Relevant guidance from US Department of Labour List of Goods Produced by Child or Forced Labour 2018, and the Know the Chain Information and Communication Technology Benchmark Findings 2018);
3. **High Risk Modules** e.g. Franchising, licensing outsourcing, etc. (Relevant guidance from Australian Fair Work Ombudsman); and
4. **Vulnerable People** (Relevant guidance from Trafficking in Persons Report (TIP) 2019).

The findings indicated that Tabcorp suppliers located in countries which are highly exposed to modern slavery risks only represent 0.2% of our supplier base.

This assessment has been reconstructed in 2022 internally, using a similar framework and taking into consideration the impacts of the COVID-19 pandemic for a more accurate and up to date view. It included analysis of the ten countries with highest prevalence of human rights violations and indicated a connection between modern slavery and two major external drivers: highly repressive regimes and conflict. During FY22, we did not engage with these high risk

countries, and only 0.2% of our supplier base was exposed to medium risk countries.

Suppliers that represent medium to higher risks are being managed by category specialists in our Procurement team. The team meets monthly internally, and regularly with suppliers to foster strong business relationships and to discuss any challenges and improvement opportunities. Any relevant risks, including modern slavery, are addressed in these meetings.

## Modern slavery risk in the supply chain

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

This year, we developed a Responsible Procurement Plan for Modern Slavery to better align with our Sustainability Framework, with the aim to continue to improve our business practices. A Source to Contract roadmap, under Tabcorp's Transformation Program, includes uplifting supplier due diligence capabilities by implementing new technology

to enhance the supplier risk assessment processes. This will replace current supplier pre-qualification checks, Contract Assessment Tool questionnaire and risk assessments. In addition, our Procurement team:

- conducted supplier segmentation and risk assessments analysis, utilising Kearney best practice Supplier Relationship Management tools; and
- created Category Strategies that identify high risk suppliers and demographics of suppliers, size of spend and category of the goods/services.

We have improved our existing risk management and remediation frameworks to mitigate identified risks, as outlined in the following sections.

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

## Information technology computer and electronic equipment

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.

While we may have limited visibility to our suppliers' supply chain and country of origin of these products, we have controls in place to mitigate this risk. For example, Tabcorp conducts go to market exercises for major purchases, and a series of modern slavery due diligence questions are asked of each supplier as part of the process. The responses to the due diligence 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.

## Facilities management

Modern slavery risks lie 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 such labour resources.

As there is a large downstream subcontractor delivery requirement, we place importance on the robust management of our principal property supplier in managing these delivery needs. This supplier conducts cleaning and facilities management reviews and audits on an annual basis from a supplier and contract manager level, which considers auditing high risk vendors individually.

To confirm there are no instances of negligence with regards to the supply of labour, suppliers are required to confirm the following (as applicable):

- Paying their employees in accordance with the Fair Work Modern Award.
- Adopting the Cleaning Accountability Framework (CAF) to confirm cleaning employees are properly paid.

- Including compliance with modern slavery requirements in their contractual supplier agreements.
- Utilising leading industry pricing schedule and analytics to confirm that there is no under payment 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

Most of our team members are professionals working in various skilled roles at our corporate offices, warehouses, and retail partners' venues. From time to time, Tabcorp procures labour hire services to supplement our workforce during peak seasonal events such as Spring Racing Carnival, when TAB Ambassadors are engaged.

Tabcorp has 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 protecting them from being underpaid. Under these laws, Tabcorp must only procure designated labour hire services from licenced providers. Labour hire licences are granted by State based authorities in accordance with legislative criteria, which includes a 'fit and proper person' test and regular reporting obligations.

Tabcorp is continually assessing our supply chain to confirm that all relevant suppliers hold an appropriate labour hire licence. 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

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

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. The Whistleblower Policy is 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.

Tabcorp has also established a dedicated Retail Workers Hotline, managed independently by Deloitte, to enable the employees of Tabcorp's retail partners 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 which is available to receive calls, Monday to Friday, between 6.30am to 5.00pm (excluding all Victorian public holidays); or
- a dedicated website which contains information about the service and how retail partners' employees can make a disclosure.

## REMEDIATION

Tabcorp's approach is to work collaboratively with our suppliers to check their understanding and compliance with our expectations regarding modern slavery and human rights standards. When we identify a potential modern slavery risk in relation to a supplier, we seek further information from the supplier and collaborate to either mitigate or remove that risk. During the reporting period, we were not aware of any instances of modern slavery in our operations and our supply chain.

## CAPACITY BUILDING

Tabcorp maintains an ongoing focus on responsible procurement, training and capacity building of all relevant team members whose purchasing decisions may impact workers' rights.

Relevant team members are kept up to date on responsible sourcing and human rights commitments and how actions may impact workers' rights through training, information sharing and capacity building.

This year, we:

- created a stand alone 'Modern Slavery' Essential Learning module for our team members. This module outlines the centralised processes to consistently identify, assess and escalate any human rights or modern slavery complaints or concerns. Team members have until the end of the year to complete the module, as part of their regular mandatory Essential Learning cycle; and
- joined the UNGCNA Modern Slavery Community of Practice, a forum facilitated by the UNGCNA, where Australian business participants can connect, navigate new developments, and share learnings regarding modern slavery.

We continue 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.

Looking ahead, we plan to further support our suppliers' awareness of modern slavery risks by developing targeted supplier training on this topic.

### Modern Slavery Community of Practice

The UNGCNA Modern Slavery Community of Practice is a small, interactive forum that helps Australian businesses navigate new developments and share learnings regarding modern slavery. The Community of Practice meets quarterly.

The purpose of the Community of Practice is to:

- connect participating UNGCNA members and enable learning and discussion on the opportunities and challenges facing Australian businesses relating to identifying, managing and communicating modern slavery risks;
- identify and share leading modern slavery interventions to enable members and other Australian based organisations to improve their modern slavery risk management program, in line with the principle of continuous improvement; and
- support members in preparing for further regulatory movement on modern slavery and human rights due diligence.

## COVID-19 RESPONSE

The COVID-19 pandemic continued to disrupt our business during FY22, increasing the vulnerability of our team members and the workers in our supply chain. We implemented several measures to keep them safe.

### Our operations

Our businesses were heavily impacted in the first half of the year by mandated retail and venue shutdowns, in particular, our largest markets of NSW and Victoria. This has presented operational challenges for Tabcorp but has not changed our assessment that the risk of modern slavery in our own operations is low.

We continued to strictly adhere to the advice and guidance of governments and health authorities across Australia to keep our team and others safe through the COVID-19 pandemic. We have maintained a range of measures including enhanced hygiene controls, physical distancing, face masks, remote working, restricted travel, incident response procedures, and wellbeing support programs.

### Our supply chain

Tabcorp acknowledges the increased vulnerabilities that the COVID-19 pandemic has placed on supply chains and workers. We continued to engage fairly with our suppliers and provided significant COVID-19 related fee relief to customers in our MAX business.

## EFFECTIVENESS

We continue to assess and monitor the effectiveness of our actions in identifying and managing modern slavery risks by tracking our actions and outcomes, partnering with suppliers and other external partners, and undertaking regular internal governance and program reviews.

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	Two training programs delivered: <ul style="list-style-type: none"> <li>• Awareness based training for Procurement and Property teams</li> <li>• Online Modern Slavery Essential Learning module – all team members at Tabcorp</li> </ul>
Number of team members completed online training on modern slavery	Procurement and Property Team: 35/35 completed via two sessions in August and September 2022  Other team members across the business: 40/2,282 as end of September 2022. New starters have 30 days to complete this module. Other team members have until the end of December
Number of grievances raised with modern slavery indicators	0
Contracts that include modern slavery clauses	New Tabcorp template agreements contain modern slavery clauses. Where Tabcorp negotiates an agreement based on supplier terms, it seeks to ensure appropriate coverage of modern slavery obligations  We conduct vendor governance meetings with strategic, tier one suppliers on a monthly or quarterly basis. Relevant risks, including modern slavery risks, are addressed in these meetings
Number of modern slavery cases identified	0

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

## FUTURE PRIORITIES

We remain committed to continuously improving our business practices to address modern slavery. In the next financial year, we will focus on the following initiatives:

- Progress with our S2C roadmap, that includes uplifting supplier due diligence capabilities by implementing new technology to enhance the supplier risk assessment processes. This new digital platform will replace current manual supplier pre-qualification checks, Contract Assessment Tool questionnaire and risk assessments.
- Develop scenario based training relating to modern slavery for key team members involved in vendor management and the procurement of goods and services.
- Develop targeted training to our suppliers to improve their awareness and understanding of modern slavery risks, our compliance requirements, their obligations and our escalation process.
- Continue to improve our diligence process by reviewing our FY22 analysis and risk assessment framework and introducing site audits for selected high risk suppliers, where applicable.
- Improve mechanisms to measure the effectiveness of our responsible procurement program.

## REPORTING ENTITIES

The following Tabcorp entities are considered reporting entities under the Act in respect of FY22 and are covered by this Statement.

<b>Reporting entity</b>	<b>ABN</b>	<b>Principal activity</b>
<b>Tabcorp Holdings Limited</b>	66 063 780 709	The ultimate holding company of the Group, which is publicly listed on the Australian Securities Exchange
<b>Tabcorp Assets Pty Ltd</b>	73 064 303 920	The primary employing entity and contracting party for procuring goods and services for the Group
<b>Tabcorp Finance Pty Ltd</b>	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
<b>Tabcorp International Pty Ltd</b>	26 006 574 652	Operates computer simulated racing products and is the holding company for the Group's non-Australian operations
<b>Tabcorp Wagering (Vic) Pty Ltd</b>	37 134 587 107	Operates wagering in Victoria
<b>Tabcorp Wagering Participant (Vic) Pty Ltd</b>	59 154 418 489	Party to the joint venture that conducts the Victorian wagering business
<b>Tab Limited</b>	17 081 765 308	Operates wagering in New South Wales
<b>Tabcorp International No. 4 Pty Ltd</b>	41 146 788 614	The holding company for the Premier Gateway International business located in Isle of Man
<b>Sky Channel Pty Ltd</b>	77 009 136 010	Operates television and radio broadcasting services
<b>Tatts Group Limited</b>	19 108 686 040	The holding company for wagering and gaming services operations
<b>UBET QLD Limited</b>	84 085 691 738	Operates wagering in Queensland

This Statement also applies to: (i) entities owned or controlled by Tabcorp Holdings Limited; and (ii) the Demerged Entities during the reporting period prior to the implementation of the Demerger on 1 June 2022.

# CONSULTATION AND APPROVAL PROCESS

The introduction of our Modern Slavery SteerCo helped to ensure a collaborative process and shared responsibility in preparing this Statement. 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.

Tabcorp has a centralised management and governance structure which applies to the Group. This includes the policies and programs through which modern slavery and human rights risks in our own operations and our supply chains are assessed and addressed by Tabcorp. This centralised management and governance structure, together with Tabcorp's policies and programs apply across the Group and also applied to the Demerged Entities prior to the Demerger.

A process of consultation across Tabcorp and its reporting entities as at 30 June 2022 (post-Demerger) helped to guide the preparation of this Statement. This included engagement with members of senior management heading every relevant function within Tabcorp, the Executive Leadership Team and the Directors of the reporting entities within the Group as at the date of this Statement.

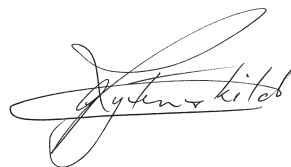
# STATEMENT ANNEXURE

## Principal governing body approval

This Statement was approved by the principal governing body of Tabcorp Holdings Limited, as defined by the Act, on behalf of all reporting entities specified in this Statement on 6 December 2022.

## Signature of responsible member

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



**Adam Rytenskild**  
Managing Director and Chief Executive Officer

## 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.

<b>Mandatory criteria</b>	<b>Page number</b>
a. Identify the reporting entity	2
b. Describe the reporting entity's structure, operations and supply chains	4-6, 14-16
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	13-18
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	17-19
e. Describe how the reporting entity assesses the effectiveness of these actions	20
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)	22
g. Any other information that the reporting entity, or the entity giving the Statement, considers relevant	8, 20

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