

**Tabcorp**

MODERN SLAVERY  
STATEMENT  
2020



## INTRODUCTION

This Modern Slavery Statement covers the activities of Tabcorp Holdings Limited and the consolidated entity comprising Tabcorp and its subsidiaries (“Group” or “Tabcorp”) and the Group’s interests in joint arrangements and associates in respect of the financial year ended 30 June 2020 (“FY20”) in identifying and addressing the potential risk of modern slavery and human trafficking in our operations and supply chain. Refer to page 11 for the list of Tabcorp entities that are considered reporting entities under the *Modern Slavery Act 2018 (Cth)*. This Statement is made on behalf of these reporting entities as well as all other controlled entities of Tabcorp Holdings Limited.

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

Tabcorp upholds our values, within our own operations and across all the partners we work with, including our suppliers. We are committed to ethical, sustainable and socially responsible procurement to ensure that we are working with partners that make fair, responsible and ethical decisions.

At Tabcorp, we believe that human rights are universal and fundamental rights that preserve the inherent freedom, dignity and equality of all human beings. As such, we are committed to operating our business ethically and treating all people with dignity and respect. We expect our suppliers to uphold human rights and integrate appropriate labour and human rights policies and practices into their business operations.

## ABOUT TABCORP

Tabcorp is a world-class diversified gambling entertainment group, listed on the Australian Securities Exchange with a market capitalisation of approximately \$6.9 billion at 30 June 2020. We operate three market leading businesses:

- **Lotteries and Keno**  
Operation of lotteries under The Lott brand and Keno pursuant to licences and approvals in certain Australian states and territories.
- **Wagering and Media**  
Provision of totalisator (or pari-mutuel) and fixed odds betting on racing, sport and other products under the TAB brand through digital and retail channels, and operation of global racing media business under the Sky Racing brand.
- **Gaming Services**  
Max Regulatory Services provides electronic gaming machine monitoring and related services across New South Wales, Queensland and the Northern Territory. Max Venue Services provides a mix of venue services nationwide.

Tabcorp is an Australian based company with operations in each state and territory. We have national reach through our retail partnerships with over 9,000 venues, the largest retail footprint of any company in Australia, in addition to our digital channels. Tabcorp also has supporting operations in the Isle of Man (a wagering pooling hub) and in the USA (a vision distribution hub). In FY20, 98.2% of Tabcorp’s revenue was derived from our Australian operations.

Tabcorp employs over 4,500 people across our operations and has over 3.7 million active, registered customers across our three businesses.

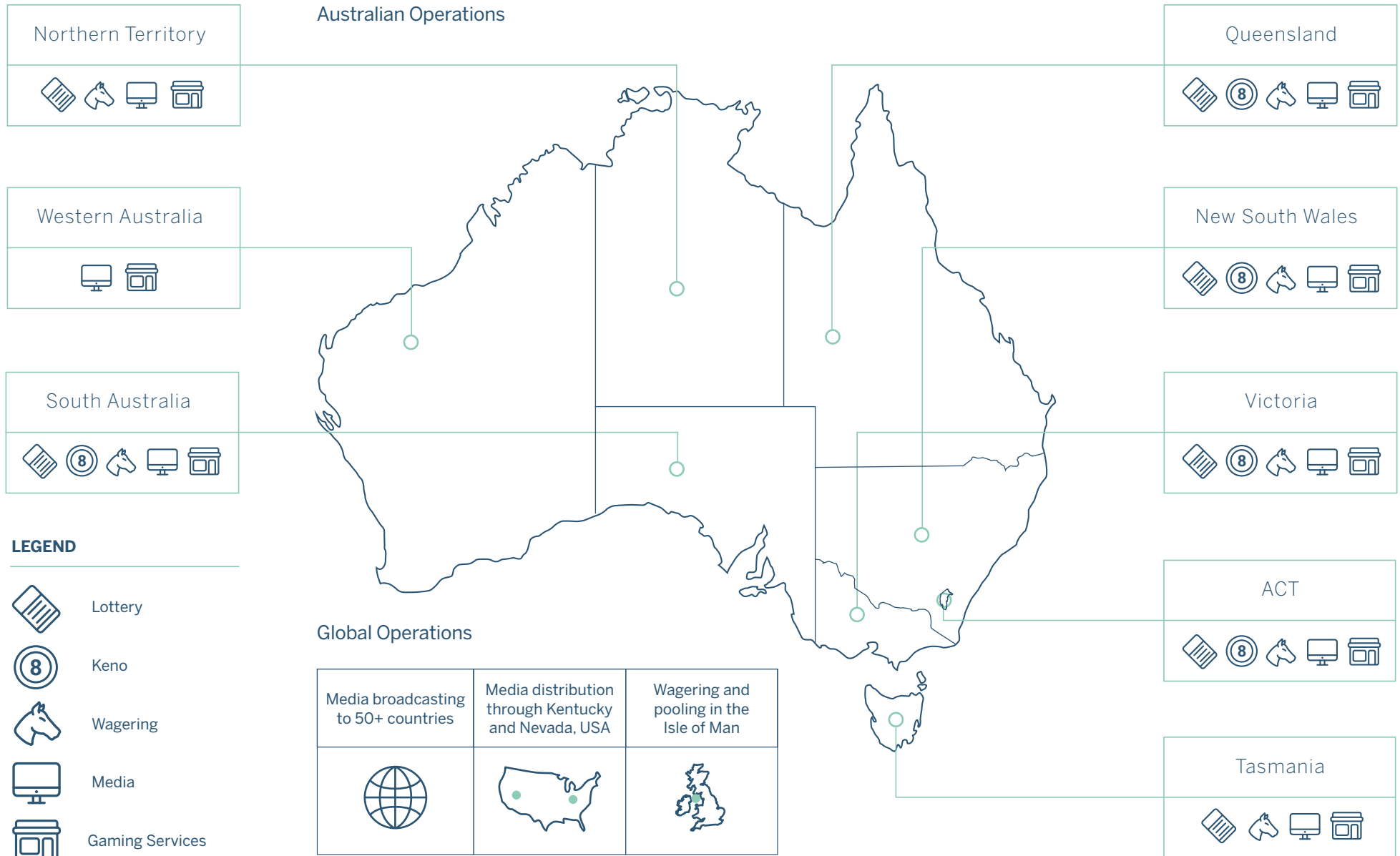
Tabcorp’s revenues in FY20 were \$5.2 billion, with net assets of \$6 billion. Our operations returned \$4.5 billion of benefits to our stakeholders in FY20, which comprised State and Federal Government taxes, employee costs, dividends paid to shareholders, payments to racing industry bodies and commissions paid to our retail partners.

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






For more information about Tabcorp’s business operations and strategy please refer to our **2020 Annual Report**.

# ABOUT TABCORP CONTINUED




## Australian Operations



### LEGEND

-  Lottery
-  Keno
-  Wagering
-  Media
-  Gaming Services

## Global Operations

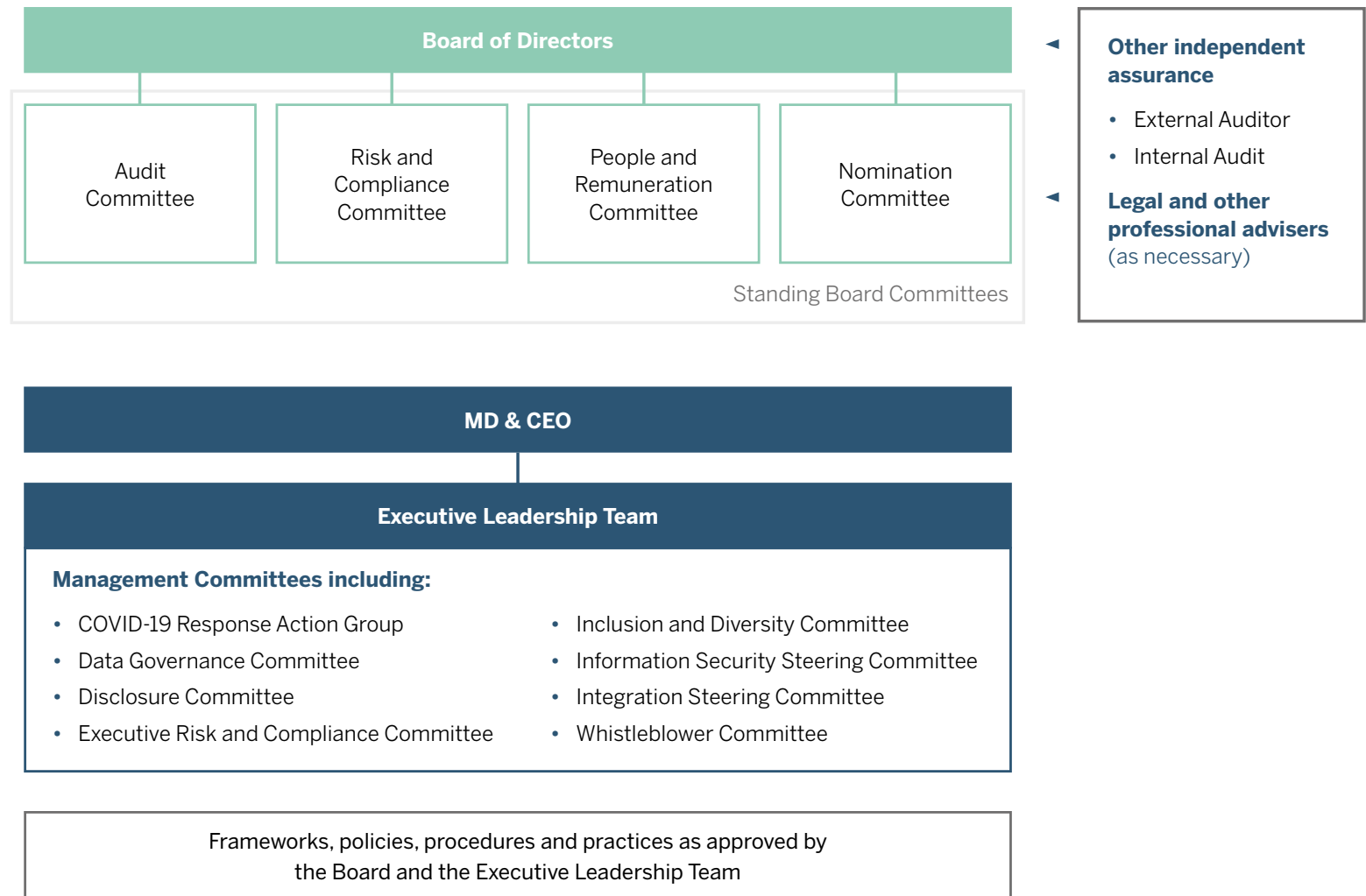
Media broadcasting to 50+ countries	Media distribution through Kentucky and Nevada, USA	Wagering and pooling in the Isle of Man
		

# GOVERNANCE AND POLICY FRAMEWORK

Tabcorp is committed to maintaining leading corporate governance practices which help us meet or exceed the requirements of applicable legislation and corporate governance standards. Our corporate governance arrangements are core to our vision to be **The Trusted Gambling Entertainment Company** and to building on our purpose of delivering **Excitement with Integrity**. Tabcorp's corporate governance framework in respect of FY20 is summarised in the diagram. Tabcorp's corporate governance arrangements are regularly reviewed and revised as appropriate to reflect Tabcorp's evolving needs, changes in law and developments in corporate governance practices.

For more information about Tabcorp's corporate governance framework, practices and policies please refer to our **2020 Corporate Governance Statement**.






Tabcorp has a number of policies in place that support our governance framework to address modern slavery in our operations and supply chain.



## GOVERNANCE AND POLICY FRAMEWORK CONTINUED

### Tabcorp Code of Conduct

Tabcorp's Code of Conduct, which was revised in FY20, is founded upon Tabcorp's values and sets out the standards of behaviour that are expected of all employees, Directors and contractors.

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

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

The Code of Conduct defines desired 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 employees about how to access support and make an official report if they experience or witness behaviour not aligned with the Code.

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

## GOVERNANCE AND POLICY FRAMEWORK CONTINUED

### Supplier Code of Conduct

In FY20, Tabcorp's Supplier Code of Conduct was developed and communicated to our suppliers. The Supplier Code of Conduct is one of the ways in which Tabcorp ensures that we work with partners that make fair, responsible and ethical decisions.

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

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

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

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

### Whistleblower Policy

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

Matters are reported through the Tabcorp Integrity Protection Service (TIPS), an independent, anonymous and secure service delivered by Deloitte, or to any of a number of Whistleblower Report Officers. The whistleblower program is overseen by an Internal Whistleblower Committee, which

has accountability and a direct reporting line to the Board Audit Committee. The Chairman of the Audit Committee, and where necessary or appropriate the Chairman of the Board, is able to securely access whistleblower reports and review the action taken. The Whistleblower Policy is regularly communicated to all employees to raise awareness of the policy and explain key features such as how to make a whistleblower report and the protections available to whistleblowers.

### Inclusion and Diversity Policy

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

### Workplace Health, Safety and Wellbeing Policy

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

## STAKEHOLDER ENGAGEMENT

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

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

In communicating the introduction of our Supplier Code of Conduct in FY20, Tabcorp individually contacted our tier one, strategic suppliers to discuss the Code. Tabcorp's head agreement template was updated to comply with our Supplier Code of Conduct and with requirements to adhere to modern slavery laws and principles.

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

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

## RISK MANAGEMENT

Tabcorp's Risk Management Framework, policies and procedures set out the roles, responsibilities and guidelines for managing risks associated with our business, including human rights and modern slavery risks. The Framework enables the identification, evaluation, monitoring, reporting and mitigation of all material sources of risk.

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

## TABCORP'S OPERATIONS

Tabcorp employs or engages over 4,500 people, over a third of which are casual or contracted employees. We are committed to complying with all applicable laws and regulations with respect to wages, working hours, leave entitlements, superannuation and workers' compensation insurance. We undertake an annual minimum wage review across all our operations to ensure that Tabcorp employees are compensated fairly and in accordance with relevant awards or enterprise agreements, where applicable.

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

### Fair Work Retail Compliance Program

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

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

#### STEP ONE: Set expectations

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

#### STEP TWO: Educate and train

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

#### STEP THREE: Monitor compliance

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

#### STEP FOUR: Take further action

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



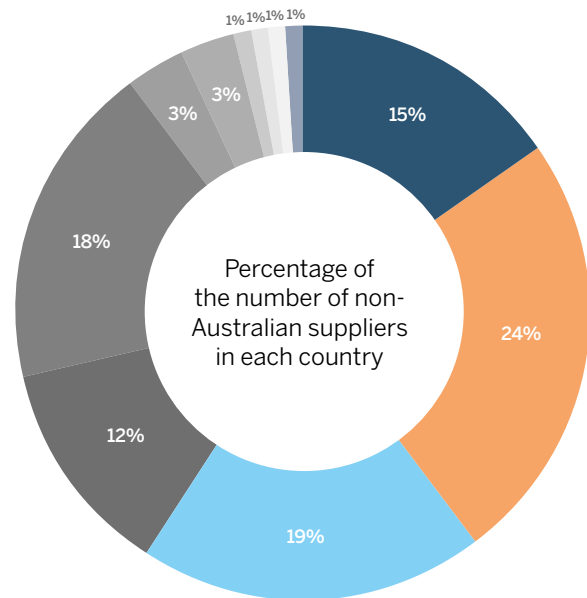
## TABCORP'S OPERATIONS CONTINUED

### TABCORP'S SUPPLY CHAIN

In FY20, Tabcorp engaged directly with over 2,300 suppliers and contractors. Approximately 64% of Tabcorp's FY20 total spend was with 50 suppliers. Our largest category of spend is information and communication technology at 56%. This includes items used to develop and manage our systems, hardware and software purchases and purchases within our gaming business. The remaining 44% of procurement spend is on activities including property, recruitment and professional services, travel and consumables.

Only 2% of total spend was with 67 international suppliers and 98% of this spend was with suppliers based in countries deemed as low risk for modern slavery according to the *Global Slavery Index*.

### Tabcorp's non-Australian suppliers by location



#### Key

- New Zealand
- United States
- United Kingdom
- Canada
- Europe
- South Africa
- Japan
- China
- Malaysia
- Singapore
- Taiwan

### Supplier risk management and due diligence

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

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

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

Tabcorp uses an independent service to monitor suppliers for ongoing modern slavery risks. The system monitors and flags confirmed, reported modern slavery incidents and pending incidents. Flags raised by the system are validated and an appropriate remediation plan is developed.

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

## TABCORP'S OPERATIONS CONTINUED

### Modern slavery risk in the supply chain

In FY20, Tabcorp assessed the maturity of our existing policies, systems and controls and remediation mechanisms to identify and manage modern slavery risks. This led to the development of a multi-year plan to manage our ongoing modern slavery response.

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

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

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

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

### Labour hire

Tabcorp has risk management processes in place to ensure we are compliant with State Government labour hire licencing schemes in Queensland, Victoria and South Australia. These schemes are designed to bring integrity and scrutiny to the labour hire sector and ensure vulnerable workers are kept safe from exploitation and being underpaid. Under these laws, Tabcorp must ensure that we only procure 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 continuing to assess our supply chain and confirm that all relevant suppliers hold an appropriate labour hire licence. We have introduced labour hire assessment questions into our supplier due diligence process and contractual arrangements that help ensure relevant suppliers have the appropriate licence before we engage them.

### Remediation

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

## CASE STUDY

As part of our risk profiling activities, Tabcorp undertook an assessment of a major cleaning provider to ensure compliance with relevant workplace and employment legislation.

Recognising that workers in the facilities management supply chain may be from vulnerable populations, Tabcorp initiated an audit of one of our largest cleaning providers through our facilities management provider. Tabcorp's facilities management provider undertook a review of rostering and payroll information and provided written confirmation that all payments to cleaning staff are in accordance with modern awards and legislation. Tabcorp will continue to partner with our suppliers to monitor compliance with our Supplier Code of Conduct.

## FUTURE PRIORITIES

Going forward, Tabcorp will progress the following initiatives:

- Establish a cross-functional Modern Slavery Working Group to oversee Tabcorp's modern slavery risk management practices;
- Uplift our supplier due diligence capabilities by implementing new technology that will enhance the supplier risk assessment process;
- Launch a supplier portal that contains a self-assessment questionnaire for new and existing suppliers;
- Develop and deliver enhanced procurement training to all employees with a focus on increasing people's understanding and awareness of modern slavery risks in our operations and supply chain; and
- Review current policies related to modern slavery to ensure they meet best practice.

## REPORTING ENTITIES

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

Tabcorp Holdings Limited  
Tabcorp Gaming Holdings Pty Ltd  
Tabcorp Wagering (Vic) Pty Ltd  
Tabcorp Assets Pty Ltd  
Tabcorp Finance Pty Ltd  
Tabcorp International Pty Ltd  
Tabcorp Wagering Participant (Vic) Pty Ltd  
Tab Limited  
Sky Channel Pty Ltd  
Tatts Group Limited  
Tattersall's Holdings Pty Ltd  
Tattersall's Sweeps Pty Ltd  
New South Wales Lotteries Corporation Pty Ltd  
Golden Casket Lottery Corporation Limited  
Tatts Lotteries SA Pty Ltd  
UBET QLD Limited

## CONSULTATION AND APPROVAL PROCESS

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

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

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



**David R H Attenborough**  
Managing Director and Chief Executive Officer

11 December 2020

[WWW.TABCORP.COM.AU](http://WWW.TABCORP.COM.AU)