

# Modern Slavery Statement



Jumbo Interactive Limited  
ABN 66 009 189 128

**This Modern Slavery Statement documents the actions taken by Jumbo Interactive Limited and its subsidiaries ('Jumbo') to identify and prevent potential modern slavery and human trafficking in our supply chain and operations for the period 1 July 2021 to 30 June 2022.**

**This statement is in accordance with the Australian Commonwealth Modern Slavery Act 2018 (the Act).**

### **Acknowledgement of country**

Jumbo would like to acknowledge the Turrbal and Yugara People, the traditional custodians of the land on which our business operates. We pay our respects to elders past, present and emerging. We would also like to extend our respect to any Aboriginal or Torres Strait Islander people engaging with this report. Jumbo would also like to acknowledge the territories of the Blackfoot Confederacy, including the Siksika, Piikani and Kainai Nations; the Stoney-Nakoda; and the Tsuut'ina Nation, land on which our subsidiary business, Stride Management, operates.

# Jumbo's structure, operations and supply chains

Jumbo is a digital lottery specialist. We provide our proprietary lottery software platforms and lottery management expertise to the charity and government lottery sectors in Australia and globally.

Jumbo was founded by Chief Executive Officer (CEO) Mike Veverka in 1995 and has grown into a leading digital lottery retailer and lottery software provider.

Jumbo Interactive Limited is the parent company of the group including the following subsidiaries:

Benon Technologies Pty Ltd, Cook Islands Tattslotto Pty Ltd, Gatherwell Limited, Intellitron Pty Ltd, Jumbo Interactive Asia Pty Ltd, Jumbo Interactive UK Limited, Jumbo Interactivo de Mexico SA de CV, Jumbo Lotteries North America, Inc., Jumbo Lotteries Pty Ltd, Stride Management Corp, TMS Global Services Pty Ltd, TMS Global Services (NSW) Pty Ltd, TMS Global Services (VIC) Pty Ltd, TMS Fiji Limited, TMS Fiji On-Line Limited and TMS Global Services (PNG) Limited.

Jumbo is an ASX300 company, headquartered in Brisbane, Australia and operating in Australasia, the United Kingdom (UK) and Canada. As of 30 June 2022, Jumbo has 192 employees across Australia, Fiji, United Kingdom, Canada and other countries. Jumbo's employees are skilled employees who are directly employed by Jumbo. Jumbo has three distinct operating segments underpinned by our proprietary lottery software platform and over 25 years of proven lottery management expertise.



The three operating segments are as follows:

Operating segment	Nature of operations	Associated supply chain
<b>Lottery Retailing</b>	Jumbo is an authorised digital reseller of Australian digital lottery tickets through Oz Lotteries and operator selling instant scratch tickets in Fiji.	Jumbo staff, third-party technology and cloud storage vendors, lottery vendor, ticket printing and transportation.
<b>Software-as-a-Service</b>	Jumbo licenses "Powered by Jumbo" digital lottery platform as a SaaS solution to government and charity lottery operators in Australia and globally.	Jumbo staff, third-party technology and cloud storage vendors.
<b>Managed Services</b>	Jumbo provides a digital lottery platform as well as effective lottery management services to charities and worthwhile causes that are looking to establish a lottery program or enhance an existing program.	Jumbo staff, third-party technology and cloud storage vendors.
<b>Jumbo Group functions</b>	Direct employment of Corporate Governance, Finance, Support, Sales, Marketing, People & Culture employees.	Office space and associated costs including utilities, cleaning, technology, stationary, kitchenware, food and beverage consumables, uniform and branded merchandise, external professional advisors and service providers (lawyers, auditors, accountants, payroll).

<sup>1</sup> Cook Islands Tattslotto Pty Ltd was de-registered 31 March 2022.

<sup>2</sup> Intellitron Pty Ltd was sold 30 June 2022.

The acquisition of Stride Management Inc., our Canadian subsidiary, was completed on 1 June 2022, after the Modern Slavery initiatives were already underway or completed for the year ended 30 June 2022. Stride employs a multi-disciplinary team of approximately 30 employees in Canada and provides a managed service to organisations seeking to fundraise via a fully managed raffle product. Stride's operations will be reviewed in the 2023 Modern Slavery Roadmap and included in future Modern Slavery reporting.

For additional details on our business and operations, please see Jumbo's annual report, available on our website at <https://www.jumbointeractive.com/dist/src/assets/pdf/2022.pdf> and our Sustainability Report on our website at <https://www.jumbointeractive.com/dist/src/assets/pdf/2022-sustainability-report.pdf>



# Modern Slavery risks in the reporting entity's operations and supply chains (including those of subsidiary entities)

As 2022 represents Jumbo's first year of Modern Slavery reporting, we have undertaken a risk assessment with a dual approach of reviewing both our top suppliers by spend and identifying suppliers who may be considered as being higher risk due to jurisdiction, industry or product to maximise coverage.

Our key suppliers by spend represent large, multinational technology and marketing businesses who generally employ a skilled workforce. Whilst we have plans for ongoing engagement and further preventative action with these suppliers, we have assessed that the residual risk of Modern Slavery in our direct business operations to be low.

We acknowledge exposure to Modern Slavery risk in our supply chain may be higher due to jurisdiction, industry or product as previously mentioned. The areas of operations we have identified as having medium to high risk of Modern Slavery due to these factors are concentrated in areas outside our core business functions and are as follows:

- Food, beverage, and kitchen consumables
- Uniforms and merchandise
- Outsourced technical development staff
- Ticket printing
- Computer and technical equipment

In respect of our operations, employee compensation and benefits are reviewed regularly to ensure compliance with relevant employment legislation, and is benchmarked using a global reward benchmarking tool to ensure employees are paid appropriately and to enable Jumbo to attract high-performing talent with market-competitive compensation.

Jumbo recognises the complexity and ambiguity of Modern Slavery in our society and is committed to ongoing investigation of and improvement to our supply chain.



## Actions taken to assess and address those Modern Slavery risks (including those of subsidiary entities)

Jumbo has developed a three-year roadmap for identifying and minimising Modern Slavery risk in our supply chain. The approach for our first year of reporting was focused on discovery and foundation-building. During the year ended 30 June 2022, we have undertaken the following initiatives for our Australian, Pacific and United Kingdom Operations<sup>3</sup>:

1. Mapped the upstream supply chains for our operations and reviewed by jurisdiction, industry, product and reviewed the availability of a Modern Slavery Statement and Code of conduct to assess risk of Modern Slavery in operations.
2. A Risk Assessment was undertaken on those suppliers in sectors considered to be high-risk for Modern Slavery ("First Priority") and suppliers given residual risk rating.
3. A Modern Slavery Framework was designed encompassing governance, risk assessment, education, procurement process, grievance, remediation and monitoring and reporting that will be implemented in stages.
4. Existing policies were and will continue to be reviewed to ensure they align with our Modern Slavery Framework including Whistleblower policy, Anti-Bribery and Corruption policy, Workplace Health and Safety policy and Code of Conduct.
5. A Human Rights Policy was introduced outlining our commitment to upholding human rights, our approach to achieve this and to address the relevant human rights risks of our business, remediation and reporting.
6. Communicated our commitment to minimising and eliminating Modern Slavery from our supply chain both via our Sustainability report and internal communications channels.

During the year, Jumbo did not establish a Modern Slavery-specific remediation process. Jumbo advocates a high standard of human rights respect, upholds this commitment and those of national laws and regulations regarding corporate social responsibility, environmental and workplace health and safety and staff inclusion and diversity throughout our operations and their associated regions. Jumbo has an abovementioned Whistleblower policy and procedure for receiving anonymous reports under this policy. Work has already begun in the 2023 reporting year to review and potentially extend this scope to include anonymous reporting of suspected Modern Slavery practises in Jumbo's supply chain.

<sup>3</sup> Due to the acquisition of Stride Management Inc. on 1 June 2022, this work will be completed during the year ended 30 June 2023.

## **How the reporting entity assesses the effectiveness of actions taken**

Looking forward, Jumbo will seek to measure the effectiveness of the initiatives introduced through the following means:

- Introduce targeted training for relevant employees including risk indicators and mitigation measures,
- Create a dashboard to measure effectiveness of controls
- Continuous monitoring and assessment of controls
- Set risk tolerance and guidance for data collection & analysis
- Maintain appropriate supplier records & audit trail



## Consultation with subsidiary entities in preparing the Modern Slavery statement

During the reporting period, we engaged with the key stakeholders at our subsidiaries to better understand their relevant supply chains and identify key suppliers. Through this process we created a heat map of medium to higher risk exposure suppliers based on jurisdiction, industry or product to maximise coverage.

## Future priorities

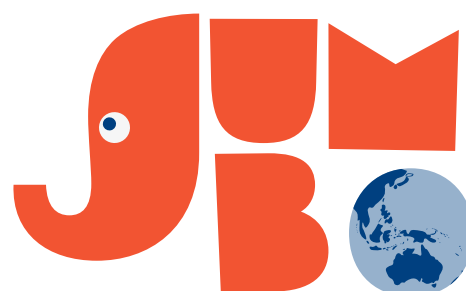
Jumbo has developed a Modern Slavery Roadmap to ensure we can deliver continual improvement. During the next reporting period, we plan to expand our Modern Slavery Framework to include the following initiatives:

1. Supply chain review for Stride Management inc., our operations in Canada
2. Develop and introduce a procurement process inclusive of risk assessment
3. Engage with our existing key suppliers to communicate our expectation of high standard of human rights
4. Introduce grievance mechanism

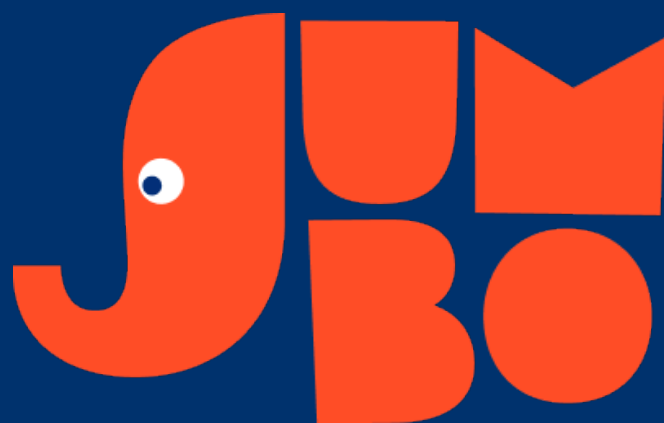


**Mike Veverka**  
Chief Executive Officer  
and Founder

This statement was approved by the Board of Directors of Jumbo on 30 November 2022







**Jumbo Interactive Limited**

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