



Sportsbet

Modern Slavery Statement

Legislation: *Modern Slavery Act 2018* (Cth) (Modern Slavery Act)

Reporting Period: 1 January 2025 – 31 December 2025 (FY25)

Foreword from the Chairman

Sportsbet is a leading Australian digital e-commerce business in the online wagering sector and is part of the Flutter Entertainment plc (**Flutter**) global sports betting group.

Sportsbet's Australian workforce and office footprint is primarily located across Melbourne, Sydney, Gold Coast, Adelaide and Darwin, with approximately 1,250 employees and is committed to:

1. developing strong and lasting relationships with suppliers;
2. identifying and mitigating any risks associated with the procurement of good(s) or service(s) from a supplier; and
3. making decisions in an accountable, ethical and transparent manner.

These key attributes and values underpin what Sportsbet stands for in our procurement activities and processes and informs our approach to dealing with suppliers.

Sportsbet continues to acknowledge that modern slavery and human trafficking is a global and complex problem which requires ongoing diligence and continuous improvement to address.

As an organisation, Sportsbet has taken steps to reduce the risk of modern slavery in our supply chains and operations.

This modern slavery statement (**Statement**) under the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) outlines the risks we have identified, our priority areas of focus based on our risk assessment, what we are currently doing to assess and address risks and key steps we are working towards moving forward.

Our values, together with the Commonwealth Guidance for Reporting Entities issued by the Australian Attorney General's Department, and the global approach adopted by Flutter, continue to inform our approach.

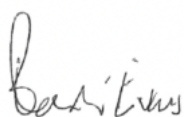
Sportsbet is committed to upholding the aims and requirements of the Modern Slavery Act. During the Reporting Period we continued to uplift our approach to modern slavery risk management, including enhancements to supplier governance and due diligence, and changes to systems and processes supporting procurement and supplier management, including the implementation of Oracle Fusion Financials as part of Flutter's finance transformation program (**Project Polaris**).

Principal Governing Body Approval

This modern slavery statement was approved by the board of Paddy Power Australia Pty Ltd (ABN 83 133 081 491) in their capacity as principal governing body of Paddy Power Australia Pty Ltd (in accordance with section 13 of the Modern Slavery Act on 29 June 2026).

Signature of Responsible Member

This modern slavery statement is signed by Barni Evans in his role as Chairman of Paddy Power Australia Pty Ltd (ABN 83 133 081 491) (in accordance with section 13 of the Modern Slavery Act on 29 June 2026).



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Barni Evans, Chairman

1. Criterion 1: Identify the reporting entity

The reporting entity is Paddy Power Australia Pty Ltd (ABN 83 133 081 491), Level 15, 367 Collins Street, Melbourne VIC 3000 (referred to as **we**, **our**, **us** or **PPA** in this Statement).

PPA is a reporting entity under the Modern Slavery Act having met the consolidated revenue threshold in the 1 January 2025 to 31 December 2025 period (**Reporting Period**).

PPA makes this Statement in accordance with section 13 of the Modern Slavery Act as a single reporting entity.

This Statement is made on behalf of PPA and its associated entities which it 'owns' or 'controls' for accounting purposes under the Modern Slavery Act (the **PPA Group**).

Our Statement covers all of the 7 mandatory criteria for reporting as set out in section 16 of the Modern Slavery Act. In preparing this Statement, we have used the Commonwealth Guidance for Reporting Entities (**Government Guidance**) and the Modern Slavery Act Supplementary Guidance to help inform and guide our approach.

2. Criterion 2: Describe the reporting entity's structure, operations and supply chains

2.1 Structure

PPA is the Australian parent company of Sportsbet Pty Ltd (**Sportsbet**) and is an Australian private limited company limited by shares incorporated in Australia and with a registered office in Melbourne, Victoria.

While PPA 'owns' or 'controls' a number of entities for the purpose of the Modern Slavery Act, the main operating entity within the Group is Sportsbet which is licensed under the *Racing and Wagering Act 2024* (NT) to operate nationally across Australia. Sportsbet is part of a larger global corporate group which is ultimately owned by Flutter Entertainment plc.

Sportsbet has approximately 1,250 employees.

2.2 Operations

Sportsbet conducts business under the Sportsbet brand and is a leading Australian digital e-commerce business in the online wagering sector with approximately 2.4 million Australian customers.

We provide online wagering services to customers through an online technology platform (via the Sportsbet App and desktop website www.sportsbet.com.au).

Sportsbet is a corporate sports bookmaker licensed in the Northern Territory and we offer online wagering nationally across Australia. Sportsbet has offices in Melbourne, Sydney, Gold Coast and Darwin (where our main call centre is located).

Sportsbet's key operations include:

- **Bet transactions** –customers place bets through our online platforms and our call centres.
- **Marketing and advertising / promotions** – our bookmaking business is supported by locally produced and distributed marketing and promotions.

- **Customer Support Services** – we operate our main call centre in Darwin and provide real-time support through our Live Chat service. During the Reporting Period, certain customer service operations were performed by Flutter Entertainment (India) LLP (formerly Rational Services (India) LLP), a Flutter group entity based in Hyderabad, India, under an inter-company service agreement entered into in 2024. While this is an intra-group arrangement (rather than a third-party supplier relationship), we acknowledge it forms part of our broader operational footprint and is relevant to our modern slavery risk assessment.
- **Safer Gambling Services** – safer gambling is a key function of our business. We provide our customers with extensive tools, resources, and real-time support services to promote safer gambling.



- **Merchandise** – we locally source a limited range of Sportsbet merchandise which is primarily available to staff.

2.3 Supply Chain

Generally speaking, our supply chain covers the following main goods and services:

- **content services** for streaming capability, pricing updates and data feeds from local racing and sporting bodies;
- **technology services** for our software, hardware and IT support services;
- **production services** to create Sportsbet advertising content;
- **merchandise** for Sportsbet branded apparel; and
- **contractors** for IT and software support services.

We also procure a range of indirect goods and services to support our operations, including (for example) facilities management, cleaning, catering, utilities, office supplies, professional services, and travel services.

We have set out a high-level summary of our supply chain in the Table below.

	Product / Service category	Key themes
Key direct suppliers we use in relation to our core service offering		
1.	Technology and Information Services (cloud computing, data hosting etc)	- As a technology company we procure a range of technology, software, content, payment solutions and other ICT services to support our core service offering of online wagering services. - Many of these companies are large cloud-based technology companies who are located in Australia and headquartered out of the United States of America. - Many of these entities are large global brands who have reporting obligations under the Modern Slavery Act.
2.	Payment Solutions	
3.	Software Platforms	
4.	Social media and Information Services	
5.	Content Production Supply and Services	
6.	Data Analytics Services	
7.	ID Verification	
8.	Merchandise Products	We have a small number of suppliers we use to procure products for our staff merchandise.
Indirect Suppliers		
9.	Catering Services	- To support our core online business Sportsbet engages a range of other suppliers who supply goods or services that are not integrated or used in our online wagering services. - These are suppliers from whom we purchase goods or services relating to, for example, utilities, facility management, office supplies and professional services and more (Indirect Sourcing). - Again, many of these companies are large companies who also have reporting obligations under the Modern Slavery Act.
10.	Cleaning Services	
11.	Courier Services	
12.	Security Services	
13.	Office Supplies	
14.	Taxi Services	
15.	Real Estate and Property Management	
16.	Professional services (such as insurance providers, lawyers, accountants)	

3. **Criterion 3: Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.**

In this section we identify the 'risks of modern slavery practices', meaning the potential for Sportsbet to cause, contribute to, or be directly linked to modern slavery through our operations and supply chains. In this context, 'risk' means to people, rather than the risks to Sportsbet (such as reputational or financial damage).

We confirm we have not identified any specific instance of modern slavery impacting Sportsbet during the Reporting Period. This statement is based on information available to us through our existing controls and processes, including supplier engagement and internal reporting channels. Sportsbet continues to treat identifying and mitigating modern slavery risks as a continuous improvement process.

3.1 **Potential risks in Sportsbet's operations**

Sportsbet reviewed modern slavery risks within its own operations during the Reporting Period.

Sportsbet's employment practices, including employment of direct/permanent workers and engagement of contractors/temporary workers, remain an area of focus.

Our main call centre is located onshore in Darwin, Australia.

a. Employment of direct / permanent workers

We did not identify any significant modern slavery risks in connection with the employment of our direct/permanent workforce nor any potential for Sportsbet to *cause or contribute* to modern slavery risks through its employment practices.

The majority of Sportsbet's employees are employed in Australia which has been assessed as having a relatively low prevalence of modern slavery. Our employees are engaged through individual contracts, and contract templates are periodically reviewed for compliance with relevant employment legislation.

We also maintain employee due diligence processes including background and verification checks, and require evidence of right to work documentation where appropriate.

b. Intra-group customer service operations (Hyderabad, India)

We recognise that India is identified in the Walk Free Global Slavery Index 2023 as a jurisdiction with elevated modern slavery prevalence. While Flutter Entertainment (India) LLP operates within the Flutter corporate group and is subject to Flutter's group-wide governance framework, policies and minimum standards (including the Flutter Code of Ethics and relevant human rights and employment-related policies), we have considered this arrangement as part of our risk assessment process.

Key risk-mitigating factors include:

- Flutter Entertainment (India) LLP is a related body corporate within the Flutter Group and subject to group-wide governance, compliance requirements and oversight;
- workers are engaged directly by the Flutter Group entity (not through third-party labour hire arrangements);
- Flutter group policies, including the Code of Ethics, Human Rights Policy and

Whistleblower framework, apply to the entity's operations; and

- the arrangement is governed by a formal inter-company service agreement.

We have not identified any specific modern slavery risks in connection with this arrangement during the Reporting Period.

3.2 Supplier risk profile – key risk factors

Sportsbet's modern slavery risks, although remote, are more likely to arise in parts of our supply chain where there is:

- labour-intensive service delivery (e.g., cleaning, facilities services)
- merchandise/apparel and associated extended supply chains;
- complex global technology supply chains (including hardware manufacturing, logistics, and certain ICT supply chains); or
- geographic risk factors where goods or services are produced in higher-risk jurisdictions.

In the previous Reporting Period, we undertook a high-level assessment of a selection of our key direct suppliers and identified several which have submitted modern slavery statements to the Australian Government operated register under the Modern Slavery Act. We continue to apply our prioritised risk-based approach to focus on the suppliers listed in section 3.3, and confirm that there has been no material change to Sportsbet's supplier risk profiles between the prior and current Reporting Period.

We will continue to extend the monitoring of our key direct suppliers for non-compliance as part of our commitment to preventing modern slavery and we will be particularly vigilant in relation to suppliers in higher-risk countries and sectors.

3.3 Sportsbet's priority areas (risk-based approach)

Based on our risk mapping and supplier engagement activities, we continue to take a prioritised risk-based approach as recommended by the Government Guidance.

During FY25, we continued to prioritise attention on:

1. **Suppliers who provide staff merchandise products** due to sector and industry risk, product and service risk and potential geographic risk. Specifically, inherent risks of modern slavery may be associated with the extended and complex apparel, uniforms and merchandise supply chain; and
2. **Cleaning and facilities-related services** associated with our workplaces, given cleaning is a known higher-risk sector.

4. Criterion 4: 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

We confirm we have not identified any specific instances of modern slavery impacting Sportsbet during the Reporting Period.

Set out below is an overview of steps we took during the Reporting Period to assess and address risks in our operations and supply chains.

4.1 **Governance and accountability**

Sportsbet's modern slavery program is overseen through Flutter's governance structures, including local Legal, Risk & Compliance and Procurement functions, with escalation through appropriate governance forums as required.

Sportsbet also aligns, where relevant, with Flutter group policies and minimum standards, supplemented by local measures suited to our Australian operations.

4.2 **Procurement and supplier due diligence (uplift during FY25)**

During FY25, Sportsbet continued to strengthen procurement and supplier management processes relevant to modern slavery risk identification and mitigation, including:

- embedding modern slavery considerations into supplier onboarding and contract processes (including use of template clauses);
- applying a risk-based approach to supplier due diligence, focusing deeper diligence on suppliers in higher-risk categories;
- requesting and reviewing supplier modern slavery statements (where applicable) or other relevant policy/controls information; and
- maintaining escalation pathways for supplier risk concerns identified during onboarding, renewal, or ongoing supplier management.

4.3 **Supplier onboarding, contract controls and renewal activity**

Sportsbet continued the phased roll-out of contractual controls, including:

- modern slavery clauses in procurement contract templates for new suppliers; and
- inclusion of modern slavery clauses and relevant supplier conduct obligations in renewed agreements as contracts come up for renewal.

This approach supports consistency and provides contractual mechanisms for supplier cooperation, information requests and escalation where modern slavery risks are identified.

4.4 **Supplier Code of Conduct**

Sportsbet maintains a Supplier Code of Conduct which outlines expectations of suppliers including in relation to ethical business practices and modern slavery risk areas (including child labour and forced labour).

Sportsbet expects suppliers to comply with the Supplier Code of Conduct and, where applicable, incorporates contractual requirements aligned to these expectations.

4.5 **Training and awareness**

Sportsbet maintains modern slavery training targeted to team members in roles where a higher level of awareness is required (for example, Procurement and relevant risk and/or compliance roles).

Sportsbet also maintains reporting channels (including whistleblowing mechanisms) for concerns about unethical or unlawful conduct.

4.6 **Oversight of intra-group operations (Hyderabad, India)**

In relation to our intra-group customer service operations in Hyderabad, Sportsbet relies on Flutter's group-wide governance and compliance framework, which includes applicable employment standards,

whistleblowing mechanisms, and ethical conduct policies.

Sportsbet will continue to engage with Flutter to confirm that appropriate controls remain in place and to monitor any developments relevant to modern slavery risk in this arrangement.

4.7 **Systems and data uplift – Oracle Fusion (Project Polaris)**

During FY25, Sportsbet progressed implementation of Oracle Fusion Financials as part of Flutter’s finance transformation program (known internally as Project Polaris). While Oracle Fusion is primarily a finance platform, it supports procurement and supplier management processes that can strengthen controls relevant to modern slavery risk management, including:

- **Supplier data visibility:** improved supplier master data structure and governance (supporting clearer supplier identification and reporting);
- **Procurement controls:** workflow-based approvals and consistent procurement processes supporting policy compliance; and
- **Auditability:** improved record keeping and traceability for procurement activity (supporting monitoring and assurance activities).

4.8 **Policies, procedures and related controls**

Sportsbet maintains policies and procedures that support ethical conduct and risk management, including:

- **Human Rights Policy** to make clear our expectations of staff and confirm our commitment and ensure there is a clear mechanism to raise relevant concerns.
- **Whistleblower Policy** that encourages Sportsbet officers, employees and contractors to “speak up” and report dishonest or illegal activity by Sportsbet and its officers, employees and contractors, through the provision of education and awareness raising, procedures and protections in respect of whistleblowing. Our Whistleblower Policy is a comprehensive document which is regularly updated and approved by our Chief Legal and Risk Officer and General Counsel. A whistleblower clause has also been inserted into Sportsbet’s procurement contract templates for use with new suppliers, and to be inserted into existing supplier contracts as they come up for renewal.
- **Code of Ethics** that defines the actions, behaviours and practices expected of and required by Sportsbet employees.
- **Anti-Bribery & Corruption (AB&C) Policy** that defines and outlines the key AB&C risk areas faced by Sportsbet and the measures implemented to mitigate these risks. They establish formal escalation channels to flag suspicious, possible and actual cases of bribery and corruption, and processes to continuously monitor and prevent bribery and corruption risks in Sportsbet’s operations.; and
- **Procurement Policy** that sets out the principles under which products and services are procured and suppliers are managed at Sportsbet and its associated entities, and also incorporates the Flutter Procurement Policy. These principles include the risk and compliance requirements for on-boarding a new third-party supplier and corresponding risk assessment (including modern slavery/sanctions screening and anti-bribery and corruption due-diligence).

We continue to consider improvement opportunities to other policies and procedures that may relate to our operations and supply chains which contribute to managing modern slavery risks (where possible). In addition to our current relevant policies and procedures, Flutter, Sportsbet’s ultimate parent company, publishes its own Modern Slavery Statement which outlines the steps taken during the year to prevent modern slavery and human trafficking in its business and supply chains.

Sportsbet supplements the Flutter approach to modern slavery compliance with local compliance measures to assess and address risks in a way which is informed by the Guidance issued by the Australian Attorney General Department.

4.9 Remediation

We monitor changes in our business and in the environments in which we operate to capture and manage any new or evolving risks so that our zero-tolerance approach to modern slavery is maintained.

If Sportsbet were to identify a modern slavery incident connected to our operations or supply chains, we would seek to respond in a way consistent with the Government Guidance, including considering appropriate supplier engagement and escalation pathways.

4.10 Monitoring developments

We have worked with modern slavery experts in Australia to consider our modern slavery compliance processes and initiatives, and to monitor Modern Slavery Act developments on our behalf, including the developments into the review of the Modern Slavery Act and the Government's response to the Statutory Review.

5. Criterion 5: Describe how the reporting entity assesses the effectiveness of these actions

We use key performance indicators (**KPIs**) to measure how effective we have been in identifying and mitigating modern slavery risks in particular training compliance. Based on these KPIs, we continually assess and improve our modern slavery compliance framework.

We are continuing to progress with our key objectives and KPIs identified in our previous Statement to measure how effective we have been in identifying and mitigating modern slavery risks in our supply chain. Based on these KPIs, we aim to continually assess and improve our modern slavery compliance framework:

No.	Key objective	Key performance indicator
1.	Implement anti-modern slavery training with key staff to raise awareness of the key concepts of modern slavery and human trafficking.	The percentage of our key staff who have received the rolled out anti-modern slavery training. <i>Completed and ongoing</i>
2.	Monitoring the number of issues reported by our Whistleblower Policy and Code of Ethics.	This will be measured by how many incidents are reported and how promptly we respond. <i>Completed and ongoing</i>

6. Criterion 6: Describe the process of consultation with any entities the reporting entity own or controls

PPA is making a 'single statement' for the purpose of the Modern Slavery Act and is required to consult with the entities it owns and controls (i.e. members of the PPA Group).

In accordance with the Modern Slavery Act and best practice guidance issued by the Attorney General's Department, this single Statement has been developed in consultation with all entities in the PPA Group.

We have also prepared this Statement with input from our internal stakeholders, including Sportsbet's legal and procurement team who have worked with modern slavery legal experts in Australia to help develop and refine our approach.

7. Criterion 7: Provide any other relevant information

7.1 Continuous improvement commitments for 2026

Sportsbet recognises modern slavery risk management is an ongoing process. In 2026, Sportsbet expects to continue focusing on:

- further embedding modern slavery considerations into procurement and supplier onboarding processes;
- continuing the phased roll-out of contractual controls through renewals;
- continuing targeted supplier engagement for higher-risk categories;
- maintaining and refreshing training for relevant cohorts; and
- continuing to mature systems and reporting capability (including through Oracle Fusion) to improve supplier data quality, governance and auditability relevant to procurement oversight.

7.2 Flutter Modern Slavery Statement

Flutter publishes its own Modern Slavery Statement describing group-wide approaches (Flutter's 2025 Modern Slavery Statement is published here: <https://www.flutter.com/modern-slavery-statement/>). Sportsbet implements relevant global policies and procedures adopted by Flutter and supplements these with local compliance measures informed by the law, guidance and best practice in Australia.

We understand the role we must play in combatting modern slavery as a leading Australian digital e-commerce business in the online wagering sector and look forward to reporting on the steps we are taking, and progress made in our next Statement.

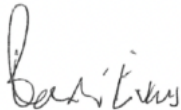
Annexure A – Approval, Signing and Mandatory Criteria

MODERN SLAVERY ACT 2018 (CTH) – STATEMENT **ANNEXURE** Principal Governing Body Approval

This modern slavery statement was approved by the *principal governing body* of Paddy Power Australia Pty Ltd (ABN 83 133 081 491) as defined by the *Modern Slavery Act 2018* (Cth) (“the Act”) on 29 June 2026.

Signature of Responsible Member

This modern slavery statement is signed by a *responsible member* of Paddy Power Australia Pty Ltd (ABN 83 133 081 491) as defined by the Act.



Barni Evans
Chairman
29 June 2026

Mandatory criteria

Please indicate the page number/s of your statement that addresses each of the mandatory criteria in section 16 of the Act:

Mandatory criteria	Page number/s
(a) Identify the reporting entity.	3
(b) Describe the reporting entity’s structure, operations and supply chains.	3 - 4
(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.	6 - 7
(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.	7 - 10
(e) Describe how the reporting entity assesses the effectiveness of these actions.	10
(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 entity covered by the statement).	10
(g) Any other information that the reporting entity, or the entity giving the statement, considers relevant.	11