Sustainability Report 2022





FOR THE YEAR ENDED 30 JUNE 2022

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CEO Mike Veverka on the phone with one lucky Jumbo Powerball player, who won \$80 million in August 2021.

ABOUT THIS REPORT

The Jumbo Interactive Limited (Jumbo) 2022 Sustainability Report explains our approach and progress towards creating a socially responsible and sustainable business with effective governance that positively impacts our people, customers and communities, while delivering long-term value for shareholders.

We published this report on 26 August 2022 as part of our Annual Reporting suite of documents. It covers the period 1 July 2021 to 30 June 2022 and is focused on our Australian business operations, unless otherwise stated. In determining the content for inclusion, notably the material topics facing Jumbo, we referenced the Sustainable Accounting Standards Board (SASB) Foundation and industry specific standards. All dollar values are in Australian dollars (A\$) unless otherwise stated. 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 Inc, operates.

The information enclosed in this report has not been subject to review by our external auditor. Please direct any questions on this report or topics related to sustainability to investor@jumbointeractive.com.

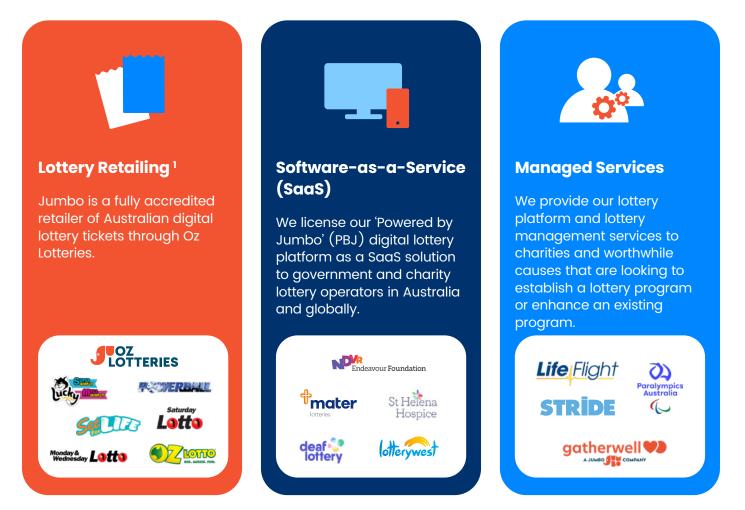
About Jumbo

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.

Our mission is to **make lotteries easier** and our vision is to become the **number one choice in digital lottery and services around the world**.

Our innovative and player-centric approach to digital lotteries and online retailing make us the platform of choice for more than 3 million active players and more than 10,000 good causes. Our platform and superior player experience is scalable and caters for causes ranging from local causes to large state and provincial lotteries. Jumbo was originally founded by Chief Executive Officer (CEO) Mike Veverka in 1995 and has matured into a leading digital lottery retailer and lottery software provider.

Jumbo is an ASX300 company operating in Australasia, the United Kingdom (UK) and Canada, with three distinct operating segments underpinned by our proprietary lottery software platform and over 25 years of proven lottery management expertise.



[1] Jumbo is an authorised reseller of lottery tickets via an agreement with The Lottery Corporation. In August 2020, Jumbo extended its long running re-seller agreement with The Lottery Corporation for a further 10 years to August 2030. The agreement does not cover the states of Queensland (due to small business restrictions limiting lottery agencies to businesses that employ less than 50 FTE) and Western Australia (where Jumbo has entered into a SaaS agreement to provide our proprietary lottery software platform and services for up to 10 years). The trademarks are licensed to Jumbo under the agreement with The Lottery Corporation.

Sustainability highlights



CERTIFIED AS A GREAT PLACE TO WORK IN AUSTRALIA WITH 91% EMPLOYEE CONSENSUS



PATHWAY TO GENDER DIVERSITY 50% BOARD 20% SENIOR LEADERSHIP GROUP 44% GROUP (Including Australia, UK, North America and Fiji)

192 131 AU 22UK 27 CA 12 OTHER EMPLOYEES AS OF 30 JUNE 2022



ESTABLISHED A SUSTAINABILITY COUNCIL with representatives from senior leadership across the business



Top quartile employee engagement and participation 83% SATISFACTION 88% PARTICIPATION (Australia and UK)



OUTLINED OUR COMMITMENT TO HUMAN RIGHTS AND DEVELOPED OUR MODERN SLAVERY ROADMAP



2:5

After consulting with a wide range of key internal and external stakeholders, we undertook a detailed materiality assessment to help identify, understand and respond to the key sustainability issues, risks and opportunities at Jumbo

COMPLETED OUR FIRST CARBON BASELINE ASSESSING SCOPE 1, 2 AND 3 GHG EMISSIONS IN AUSTRALIA





Vision to increase the proportion of women in senior leadership roles

ESTABLISHED OUR COMMITMENT TO DIVERSITY, EQUITY AND INCLUSION WITH CLEAR TARGETS

Return to cause funds raised by our charity partners, excluding state based lottery taxes from Lotterywest and The Lottery Corporation
 Lottery Retailing for the 12-month period ended 30 June 2022

Message from Chair and CEO

"We are very proud to present our inaugural Sustainability Report and outline the significant progress we have made in improving our understanding and management of the key Environmental, Social and Governance (ESG) risks and opportunities facing our business."

We understand the importance of sustainability as we continue to grow, and that the consistent delivery of strong sustainability outcomes helps us to build trust with our key stakeholders, win new customers, attract and retain talent, mitigate risk and drive improved business performance and increased shareholder value.

We believe that boards need to take a long-term view on Environmental, Social and Governance (ESG) topics, and skilled directors should be looking at what is on the horizon. For Jumbo, emerging topics include: succession, new sources of disruption, changes in regulation, and innovation in our sector.

Through the People and Culture Committee (PCC) and Audit and Risk Management Committee (ARC), the Board maintains general oversight on the progress we are making on our sustainability agenda. This year, a Sustainability Council was established, reflecting a cross-functional working group of senior leaders. The Sustainability Council is responsible for implementation of our overall sustainability program of work and reports directly and monthly to the Board.

As part of its remit, the Sustainability Council engaged with a broad range of internal and external stakeholders to undertake our first ESG materiality assessment and identify the key topics that matter most for our business. This assessment has helped us prioritise the key elements of our sustainability program of work.

In the current environment, and as a pure-play digital lottery specialist, it is no surprise that data protection, privacy, cyber risk and security and responsible play were identified as the most material ESG topics for Jumbo. We work hard to keep up to date with emerging data security regulation and best practice trends to maintain the integrity of our service offering and the privacy of our customer database. Through the deployment of our best-in-class lottery software and continued investment in technology, we have created a highly engaging and personalised player experience. While this has led to strong attraction and retention of players, our priority is always their welfare and we work hard to create a safe and trusted environment that does not result in excessive gambling or players extending beyond their means.

In November last year we launched our new Diversity, Equity and Inclusion Policy outlining our commitment to pay equity, inclusion, and gender and cultural diversity. As with many other industries, the technology industry is experiencing a significant shortage of skilled workers; the demand and competition for talent with digital skills is higher than ever before. To combat this, Jumbo implemented a career-development tool to support skills development and career planning for our employees. Our goal is to ensure our employees are continually developing in line with the needs of the business and that we retain talented people. Additionally, to ensure we attract and retain talent we have launched a new Talent Management Framework – encompassing workforce planning, learning and development, and succession planning – and refreshed our employee value proposition. Earlier this year, Jumbo was certified as a Great Place to Work in Australia with over 90% employee consensus and we became a signatory to HESTA's 40:40 Vision, aimed at achieving gender balance in executive leadership across ASX 300 companies.

At Jumbo, we advocate for human rights in our supply chain and this year we completed our first risk assessment of key suppliers to create a baseline for our Modern Slavery Statement and Roadmap. We are also committed to acting within our sphere of influence to positively impact our people, customers and the diverse communities we operate in. Together with Reconciliation Australia, we are developing our Reflect Reconciliation Action Plan (RAP), setting out our key reconciliation initiatives. In November, we will commence exploring an Innovate RAP aimed at implementing identified initiatives.

Effective governance and risk management is critical to Jumbo's ongoing success and we are taking steps to ensure our governance foundations are robust and foster a proactive risk management culture. We continue to develop and strengthen our Governance Framework and risk management practices as we expand overseas to ensure we are meeting the expectations of our stakeholders as well as all our regulatory requirements in these jurisdictions.

As a Board we have closely followed the recent enquiries into the casino sector and are discussing the lessons learned and what went wrong and why. We take our duties and responsibilities seriously and continue to review our governance across all risks in our business, including new risks which come with international expansion. Our commitment to ethical and appropriate behaviour and practices at all levels of Jumbo – Directors, management and employees – is one of the key reasons our clients choose to partner with us.

In our first Sustainability Report we have provided additional disclosure on the key ESG topics impacting our business. This report outlines our commitment to being a socially responsible and sustainable business that delivers value for all our stakeholders. We know we have more to do and look forward to providing updates on our progress.



Mike Veverka Chief Executive Officer & Executive Director



Susan Forrester AM Chair & Non-Executive Director

Our Strategy



At Jumbo we are on a mission to make lotteries easier – easier for our partners and easier for our players. Our vision is to be the number one choice in digital lottery and services and this drives us to increase the number of active players on our platform – our North Star.

The Strategy embraces three principles: maximise, replicate and diversify.

- Maximise our product and services to attain more market share and create more shareholder value.
- Replicate our product and services model in the markets we enter to ensure we maximise scalability and profitability.
- Diversify into new products and services, allowing us to continuously improve and seize more market opportunities.

Key areas of focus

The Australian market is strategically significant for Jumbo and central to driving short, medium and long-term growth. Jumbo's regional achievements to date have enabled our business to invest and expand our international footprint and product offer. Jumbo recognises that future growth will come from our platform (PBJ) and our systems, processes and expertise. This creates scale and data-driven decision making.

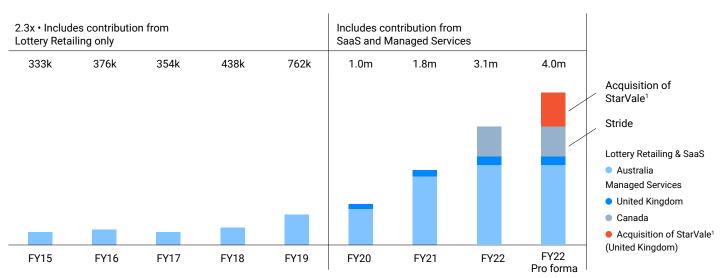
[1] Pending regulatory approval, expected by the end of Q1FY23

Moving forward, Jumbo will maximise Oz Lotteries and Lotterywest opportunities, ensuring we invest in and improve our core product and services. Jumbo's strategy is to replicate the success of the Australian model to expand our international presence, growing market share in the UK, Canada and the Unites States. The success of the Australian market will be used to demonstrate the commercial benefits and business growth that can be exported to our international markets.

Jumbo has made three significant acquisitions to date: Gatherwell, Stride and StarVale¹. In FY23, we will integrate these acquired assets into the Jumbo Group. Over time, we will seek to deploy our Group led best practices including our best-in-class software, data-led player focus, tooling and oversight, ensure cultural alignment across businesses and invest in growth initiatives.

Jumbo places considerable importance on delivering enhanced player experiences to our active player base. The number of active players we have is a key metric for success – Jumbo's 'North Star'.

Active players who made a purchase in the 12-month period (FY15 - FY22)



[1] Acquisition announced 27 January 2022 and pending regulatory approval, expected by the end of QIFY23

A clear strategy and operating model to deliver sustained growth

Our operating model comprises three distinct operating segments with clear value propositions in their targeted markets. Jumbo's aspiration is to grow our relatively nascent SaaS and Managed Services segments to rival that of Lottery Retailing over time. Successful execution of our strategy will deliver value for our key stakeholders.

'Making Lotteries Easier' by being the number one choice in digital lottery and services

Our Mission and Vision

Maximise

Our product and services attain more market share and create shareholder value

Replicate

Our product and services model in the markets we enter to ensure we maximise scalability and profitability

Diversify

Into new products and services allowing us to improve and seize market opportunities

Vision

Strategic pillars

Three distinct operating segments servicing the full lottery management value chain

Lottery Retailing

Selling lottery tickets through the internet and mobile devices

Software-as-a-Service

Licensing our 'Powered by Jumbo' SaaS lottery platform to government and large charity lottery operators

Managed Services

Providing our 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

Three operating segments

Lottery management excellence

Exceptional player experience | Continual innovation | Scalable

Best in class lottery software

Standardised and simplified platform driving scale | High standards of performance and reliability | Complemented by modern technology and integrations

Shareholders

- Top quartile TSR¹
- Targeted dividend payout ratio of 65%
 -85% of statutory NPAT

Players

- Best player
 experience and
 advocacy
- Maximised community benefit from funds raised

People

 Top quartile employee engagement
 A Great Place to Work

Community

 A socially responsible and sustainable business, with positive social impact

Core capabilities

Outcomes

Our approach to sustainability

Jumbo is committed to being a socially responsible and sustainable business with effective governance that positively impacts our people, customers and communities, while delivering long-term value for our shareholders.

Our charity partners use Jumbo's best-in-class lottery software to raise vital funds to support a range of social services and good causes. In FY21, we helped our charity partners raise \sim \$200 million ¹.

The Board reviews and engages on ESG topics as part of their responsibility for oversight and stewardship of the Company's strategy and culture. Operationally, the PCC and ARC monitor ESG risks and opportunities associated with their Charters. For example, the PCC brings a holistic focus to aspects of people and culture including remuneration, diversity and inclusion, employee experience, learning and development and our culture. The ARC has oversight of key audit and risk-related topics such as privacy, data security, cyber security, regulatory compliance and risk management.

The Board ensures it remains well-informed on current and emerging ESG topics through regular updates from management, engagement with shareholders and the investment community, and interactions with subject matter experts invited to attend Board meetings and inform Directors on topics relevant to Jumbo and the sector.

In November 2021, the Board endorsed the establishment of the Sustainability Council, which is responsible for the development and implementation of our sustainability program of work. The Sustainability Council comprises senior leaders from across the various functions of the business, including Sales and Marketing, People and Culture, Risk Management, Compliance and Internal Audit, and Investor Relations. The Board and management have adopted the following sustainability governance structure.





Stakeholder engagement

Jumbo engages with a broad range of stakeholders to better understand their views and sustainability priorities. We identified our key stakeholders based on the level of interest and impact they have on our business. The way in which we engage with our key stakeholders and the key areas of focus are summarised below.

STAKEHOLDER GROUP	METHOD OF ENGAGEMENT	AREAS OF FOCUS
Customers / Players	 Player feedback via Customer Support team interactions and surveys EDMs, push notifications, in-app messaging Focus groups and player interviews for feedback on 	 Player experience Design/features Customer satisfaction Speed of response
	design/features Reviews on Apple and Google Play stores 	Privacy of customer dataIssue resolution
Partners / Clients	 Client pitches Regular performance reviews 	 Regulatory compliance with applicable laws and regulations
	 Ad-hoc meetings Surveys 	 Performance – such as service levels, uptime, marketing KPIs
	 Collaboration on system enhancements and marketing plans 	 Platform and service reliability and enhancements Lottery management expertise Sound governance
mployees	Internal communication and collaboration tools	Diversity, Equity and Inclusion
	 Employee surveys Company events, town halls and conferences 	 Talent management Wellbeing Remuneration
Shareholders and analysts	Half year and full year results presentations	Revenue and earnings growth
	 Investor roadshows and meetings Investor conferences 	Strategy execution Dividends
	Retail investor presentations	Remuneration
	Annual Report	ESG performance
	 ASX announcements Annual General Meetings 	 Transparency and disclosure
Government and regulators	Industry conferences	Responsible Play
	 Ad-hoc meetings with regulators Ongoing correspondence 	 ISO certification Regulatory compliance (including Know Your Customer, Privacy Act, General Data Protection Regulation (EU),
		Corporations Act, Payment Card Industry Data Security Standards, Taxation) • Fraud
		Corporate governance ASX compliance
Suppliers and partners	Operational meetings with key suppliers	Responsible Play
	 Service level meetings Industry conferences 	Regulatory compliance Service levels
	Contract renewals	Sustainable supply chain
		Cyber and data security
Community	 Sponsorships Volunteering 	 Reconciliation Action Plan Gender and cultural diversity
	Meetings and conferences	Community investment
Media and Public Relations	Media releases	Responsible Play
	One-on-one interviews Social modes channels	Business performance Life changing events for lettery winners
	 Social media channels Advocacy 	 Life-changing events for lottery winners

Materiality assessment

Jumbo seeks to proactively manage material ESG risks and opportunities identified through engagement with key stakeholders.

In November 2021, we completed our first sustainability materiality assessment to prioritise key ESG topics based on the importance to our stakeholders and the impact on our business.

The materiality assessment was conducted using the following research methods.

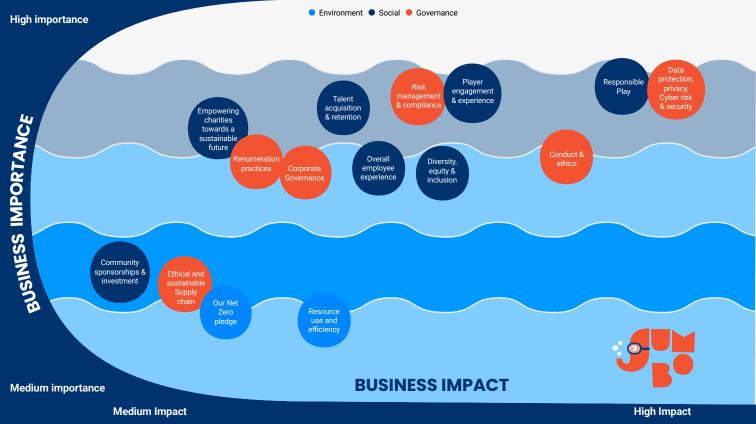
- A review of the Sustainable Accounting Standards Board (SASB) standards relevant to the Technology and Gaming industries.
- A desktop review of ESG trends, media reports and peer activities across Australia.
- A workshop with key internal representatives to identify the ESG topics relevant for Jumbo.
- Analysis of targeted ESG survey responses from over 85% of our workforce.
- Analysis of survey responses and discussions with a wide range of external stakeholders including investors, analysts, partners, suppliers and regulatory bodies.

- Consultation with independent consultants, subject matter experts and officers responsible for ESG at other companies across a variety of sectors.
- Analysis of survey responses and comments from the Board and Executives.
- Focus group sessions with existing and potential players to understand player behaviour and insights, including ESG concerns.
- · Participation in ESG industry forums.
- An internal workshop with key business representatives to validate the ESG topics identified as being most significant for Jumbo.
- Discussions with the Board and executive leadership team.

Our materiality matrix illustrates the findings from our research and has helped us prioritise our sustainability program of work and ESG disclosures.



Things that matter every day



Sustainability priorities

The key priority areas for Jumbo including the sustainability targets we are seeking to achieve over the medium term are as follows:









Responsible Play

Jumbo is a responsible gaming supplier aligned to the World Lottery Association (WLA) Framework; a member of the Asia-Pacific Lottery Association (APLA); and holds the necessary licenses and certifications in each country and state in which we operate. We have reviewed our PBJ platform in conjunction with Lotterywest to ensure compliance with the WLA level 4 responsible gambling standard.

Understanding our product

We commissioned an independent review of research by Capuchin Behavioural Science to investigate the nature of lotteries and better understand the effect our products may have on players and the wider community. Capuchin examined both peer-reviewed academia and industry reports and the key outcomes were as follows:

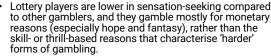
- Extant literature provides strong evidence that lotteries generally are far less harmful than other gambling formats, and charity lotteries are the form of lottery with the lowest potential for harm.
- Specifically, lotteries have a very weak association with problematic gambling, and much of the link that does exist can be explained by people who gamble via multiple formats.



How 'Hard' the Game Is

CHARITY LOTTERIES

- Even 'softer' than other lotteries
- Frequency of draws and payout often even lower than for lotteries
- Almost zero risk: less likely to gamble at all
- Motivated by charity and community
- About 'normal': may even be more agreeable than average



- Relatedly, lotteries are designed in a way that make them less exciting and compulsive than other games and have a much lower illusion of control.
- Charity lotteries, meanwhile, have even less potential for harm, and are associated with even less pathological personality traits, because the driving motive is charitable support (i.e. altruism and community) rather than money, and because the lower payouts and even more infrequent draws make them less likely to induce problematic behaviours.

Spectrum of Gambling Activities



Typically very 'soft' gambling, e.g.

Slow pace and not stimulating;

players believe it's (mostly) luck

Low relative risk of problematic

Far less pathological than other gamblers; external locus of control

Motivated by money and community

the National Lottery

gambling

fantasy

BETTING

- · Mid-to-high level of "hardness', e.g. sports betting, bingo
- · Somewhat stimulating and fast-paced; players believe skill is involved
- · Mid-to-high relative risk of problematic gambling
- · Motivated by thrill
- · Somewhat sensation-seeking, disagreeable, disorganised



- The 'hardest' form of gambling, e.g. EGMs, online casinos
- · Stimulating and fast-paced, with many near misses
- Higher relative risk of problematic gambling
- Motivated by escaping negative emotions
- · More sensation-seeking, disagreeable, disorganised

Source: Capuchin Behavioural Science, March 2021. Typically, two types of gambling are considered from a structural perspective: 'hard' gambling, which is considered to carry greater potential risks than others, usually because of the high or rapid staking associated with it (e.g. roulette, blackjack, fruit machines, instant scratchcards); and 'soft' gambling, such as lotteries (Griffiths, 1997; Home Office, 1996).

Jumbo's lottery platforms protect players.

Supporting our Players

Jumbo is committed to making a positive impact on our community by ensuring our player experience is fun and safe. Responsible Play principles are at the heart of our technologies. As a responsible business, safeguards are built into Jumbo's lottery platforms to protect players and meet the responsible gambling codes in the jurisdictions in which we operate.

As a predominantly digital offering, we can monitor and engage with vulnerable players in real-time and take immediate action to prevent at-risk behaviour.

Know your customer

How it works:

Our lottery-retailing platform (PBJ) monitors transaction frequency and value in real-time and flags any deviation from expected behaviour.

This control serves a dual purpose: it identifies potential at-risk behaviour and also fraudulent account activity at the earliest possible opportunity and offers support.

For more information, visit our website www.ozlotteries.com/about/responsible-gaming

Responsible gambling in our subsidiaries

The lotteries managed by Gatherwell are draw games supporting not-for-profit causes, such as schools and charities, and the maximum prize offered in any Gatherwellmanaged lottery is £25,000. These factors make the risk of gambling harm from Gatherwell-managed lotteries extremely low.

Gatherwell recognises that there may be players who through other gambling activities - are at risk of harm and therefore may need to access help or to self-exclude. To support these people, Gatherwell has a dedicated UK-based call centre to respond to client and player queries and requests. All customer service employees undergo training in handling reports of problem gambling and self-exclusion requests.

Through membership of The Lotteries Council, Gatherwell and its clients make annual financial contributions to organisations that deliver or support research into the prevention of gambling-related harms and treatment for those harmed by gambling.

A dedicated Australia-based call centre exists to respond to Oz Lotteries' player queries and requests. All call centre employees undergo regular and mandatory training to identify signs of problem gambling, including changes in player spending or frequency of play. Employees are also equipped with robust in-house protocols and procedures to support at-risk players.

Safeguards

- · Dedicated trained Australian-based Customer Support
- Responsible Gambling Policy
- Player ID verification
- Setting pre-commitment and spend limits to control spending based on a time period or certain dollar amount
- Setting deposit limits, by amount, by payment source or time period
- Self-assessment
- Self-exclusion
- Responsible Gambling Account Statement to show spending and prize amounts.
- 'Where to get help' resources
- Manual review of account activity







flagged due to spending

	Self
35	exclusion requests

Safeguards

- · Dedicated, trained UK-based customer support
- Responsible Gambling Policy
- Ticket sale limits
- Self-exclusion
- 'Where to get help' resources
- Manual review of account activity for any accounts with recurring purchase of over 10 tickets



Our players

Player experience and engagement

At Jumbo, we have a player-centric approach; ensuring a safe and fun environment for all our players is our priority. We focus on player needs through the use of qualitative and quantitative data to inform decisions on our platform to help drive innovation and business growth. We use surveys, customer interviews, and usability testing to source relevant data that provides both coverage and clear insights. Jumbo's success depends on meeting player's needs and providing them with an engaging experience.

Player feedback banners are present on all PBJ sites. This data is used to monitor and measure the sentiment of our customers and help us determine the most desired improvements to the platform.

Oz Lotteries have been developing our messaging to ensure we are engaging with our players in a way that benefits them most. Through our data and insights we are ensuring that our players are receiving the right message, at the right time, for the content they're actually interested in.

Innovation

Jumbo has a philosophy of customer-driven continuous innovation and uses customer insights and data to ensure the best experience for customers and players.

Play Page

Multiple improvements were made to the play page and number picker in 2022 making it easier for players to pick and play their favourite numbers. Now, they can quickly ensure their favourite numbers are included when they're making a checkout.



This change was implemented following interviews with customers to understand where they struggled with the purchase flow. Jumbo tested all improvements with customers to ensure each decision improved their experience.

Lotto Party

Lotto Party was launched in 2018 following consultation with customers about the pain of organising syndicates with family, friends, and co-workers.

Oz Lotteries is continuing to refine this feature and uses customer input to maximise their experience and remove roadblocks to its use. This incremental approach to innovation has improved Lotto Party's engagement and retention.

Personalised Recommendations

By using player behaviour and transactional data we can recommend products that are relevant to players at an individual level on the PBJ platform. This increased relevancy ensures that we message players when we think there is something that will delight them. The quantitative data collected suggests that this has improved a players' journey and streamlined their purchase flow.

Key player metrics















"The Jumbo team has worked brilliantly with Lotterywest to create an opportunity for shared growth, it's the sort of creativity and collaboration that underpins our growing partnership in WA."

Ralph Addis, CEO Lotterywest

Helping charities raise vital funds



Our 49 year lottery history; and draw-on draw performance >10% growth

Organisation background:

Endeavour Foundation is an independent, for purpose organisation established in 1951 with a vision to support people with an intellectual disability to live their best life – starting with equal access to education and life skills learning.

Lottery Programme:

Endeavour launched the Lottery programme in 1971; the first draw included a farm as the main prize. Since this point, the lottery programme has grown to approximately \$40 million.

The lottery is a significant component of Endeavour's supporter fundraising program; with the income derived enabling Endeavour to increase its community reach and impact.

Jumbo Partnership:

Endeavour has partnered with Jumbo since 2016; originally via OzLotteries and in 2019 this expanded to include licensing the "Powered by Jumbo" lottery platform too.

Jumbo's demonstrated experience in developing and scaling lottery programs, as evident by Oz Lotteries, and built on a player-centric philosophy; partnership approach, including cost effective, performance based pricing model; and unique lottery-specific expertise has supported the organisation recording our highest grossing year in our 49 year lottery history; and draw-ondraw performance >10% growth.





"We are lucky to enjoy a long and productive relationship with Stride - a Jumbo company."

STARS is a charitable, non-profit organisation, created and supported by the community of western Canada to provide life-saving helicopter air ambulance services.

Since we embarked on our first mission in 1985, we've been driven by the goal of providing people the vital care they need when they need it the most.

Whether it's offering hands-on training to rural medical providers or providing rapid, emergency medical transportation for the critically ill and injured, we operate 24/7 from bases across western Canada, anticipating and acting when people need our help.

OUR PARTNERSHIP WITH JUMBO:

"The STARS Lottery is such a critical piece of our annual fundraising program, and we are lucky to enjoy a long and productive relationship with Stride - a Jumbo company," said Andrea Robertson, STARS president and CEO. "We rely on their knowledge and expertise to help us meet our goals today and for the past 15 years."

About STARS

Simply put, STARS fights for life. Since we embarked on our first mission in 1985, we've been driven by the goal of providing people the vital care they need when they need it the most. Whether it's offering hands-on training to rural medical providers or providing rapid, emergency medical transportation for the critically ill and injured, we operate 24/7 from bases across western Canada, anticipating and acting when people need our help.

It all began when a pregnant woman from a rural community died from blood loss, leaving a father alone with their newborn. For STARS founder Dr. Greg Powell, her death was one too many. Something had to be done.

Motivated to change emergency care across rural Alberta, Dr. Powell and his colleagues created a helicopter air ambulance service, which was built and supported by the community. As we've grown and evolved, STARS has never wavered from our mission. Fundamentally we all believe that where you live, work, play and travel shouldn't impact your chance of survival.

Since 1985, we have proudly flown more than 45,000 missions. Thousands of people have been touched by STARS including our patients, their families and friends and those in their communities. STARS brings a flying intensive care unit to critically ill and injured Canadians every day. Our experienced pilots, physicians, nurses and paramedics use their critical care expertise to help save lives.

VIP Story

Kolt Dobbin was just eight years old when a tree crashed down on him as he was hiking with his family on a catwalk built onto the side of a canyon.

"I remember, I just heard a crack," said his mom, Dawne Dobbin. "And then I remember looking up." "Trees and stones and dirt came over the top of a cliff," said his dad Jason Dobbin, "and it took the side of the catwalk off, with Kolt being the middle of that."

The last thing Kolt remembered before the tree struck him was that he and his family were heading for ice cream.

"I remember coming down the stairs, and that's all I remember," said Kolt, now fully recovered from his injuries. "And then I remember getting up, and then I think I just went back to sleep."

Not long after the incident, Kolt returned to his hockey team and was back to helping on the family farm. He expressed sincere gratitude to the people at STARS who made all the difference.

"I don't think I'd be sitting here right now if it wasn't for STARS," he said. "It saves people's lives." "We will forever support STARS (and) talk about STARS," said Dawne. "It's a pretty important service."



Above: Kolt Dobbin, a STARS VIP (Very Important Patient)

"I don't think I'd be sitting here right now if it wasn't for STARS," – Kolt Dobbin

Our People

Our culture plays a powerful role in supporting our high level of employee satisfaction, attraction and retention. Jumbo's values, leadership, behaviours and attitudes contribute to our diverse, inclusive and equitable workplace environment.

As a growing company, we are cultivating a culture where talented people want to work and can progress their careers. Guided by our People Strategy, we have created an environment that allows our people to thrive. Our culture is ingrained in our ways of working, driving high performance and advancing our success.

Jumbo Values



WE ARE OPEN AND RESPECTFUL

- Through honest and transparent communication, we create lasting trust and respect for our partners, customers and each other.
- We are open in our actions and feedback, and actively listen and act upon what our colleagues and partners have to say.
- Our common goals are clear and we are humble in our achievements. By working together with integrity and acceptance that we are all individuals, we are able to achieve more.



WF ARF ADAPTABLE

- We are committed to continuously improving and actively seek solutions and embrace new ideas.
- Our optimism and can-do approach enable us to be agile and gives us the courage and determination to try new things. We listen to and learn from each other and our partners, facing our successes and failures with humility and positivity.
- Through effective change management we remain outcome focused and continuously strive for quality.



WF TAKF **OWNERSHIP**

- We are empowered, supported and encouraged to take ownership when challenges arise.
- We lead with honesty, consistency and fairness, taking responsibility and being accountable for the outcomes of our decisions.
- We provide a safe, productive and fulfilling work environment, promoting continuous learning and investing in opportunities to enhance growth through knowledge.

WE CREATE POSSIBILITIES

- We are committed to providing outstanding products and unsurpassed service to our players and clients.
- Our curiosity and hunger to improve gives us courage to take calculated risks.
- We use our initiative and drive to creatively solve problems by being innovative and pushing boundaries.
- We are driven to do what is right, not what is easy, and we give our best in everything we do.



WE EXIST FOR **OUR PLAYERS**

- Player outcomes are at the centre of what we do.
- We are passionate about working with our players to identify their challenges. Committed to delivering flexible and dependable solutions to ensure they are successful.

JUMBO Achievements



March 2022 Jumbo Australia certified as a great place to work with 91% employee consensus



Women in Diaital November 2021 Finalist in the Digital Workforce: Skills for the Future Award



Employer of Choice November 2021 90% of employees recommend Jumbo as an employer of choice



Internal Succession July 2022 38% of vacant roles filled by internal applicants





Diversity, Equity and Inclusion

Our Commitment

At Jumbo, we aspire to have Diversity, Equity and Inclusion (DEI) as part of our DNA. If we get this right, it will shape and define our business, empower our people and ultimately our players. Our vision is to develop cultural intelligence within our workforce, foster a psychologically safe workplace where Jumbonians thrive, and encourage and include unique individual perspectives and life experiences in our daily practice.

Jumbo is committed to providing all employees with a respectful, diverse and inclusive workplace. We work continuously to build a culture that ensures our people are treated with fairness and provided with equal opportunities. We consider social and cultural issues in our decision-making and have implemented local programs to remove obstacles to equity wherever possible.

Jumbo's DEI initiatives are supported by our practices and policies on recruitment and selection; compensation and benefits; professional development and training; promotions; social and recreational programs; and the ongoing development of an inclusive work environment. These practices and policies are built on the premise of gender and diversity equity that encourages and enforces respectful communication, teamwork and employee participation, and work/life balance that accommodates employees' varying needs.

As we develop and retain the best people, more people will want to join our company because they know they will be made to feel welcome and included as a valuable member of our team. Through this we will establish a rich and thriving community. Our aim is to ensure that all employees are given equal opportunities and that Jumbo is a fair representation of the communities in which we operate.

Principles

- We foster an environment where our people have a sense of belonging. Our culture of respect for difference encourages collaboration and creative thought.
- We seek to employ a workforce that reflects the communities in which we operate and be regarded as an employer of choice for all.
- We seek to be more active in attracting, retaining and valuing people of diverse cultural, racial and socioeconomic backgrounds.
- We endeavour to incorporate employee attitudes to different aspects of DEI into our DEI commitments and actions.
- We hold each other accountable for enabling inclusive practices.
- We seek to ensure that our DEI commitments encourage people at all levels in the company to contribute to and to be involved in its implementation.

Strategy Goals

Our DEI strategy is focused on pay equity, inclusion, gender diversity and cultural diversity. This approach will increase workforce engagement, creativity, innovation, productivity and retention.

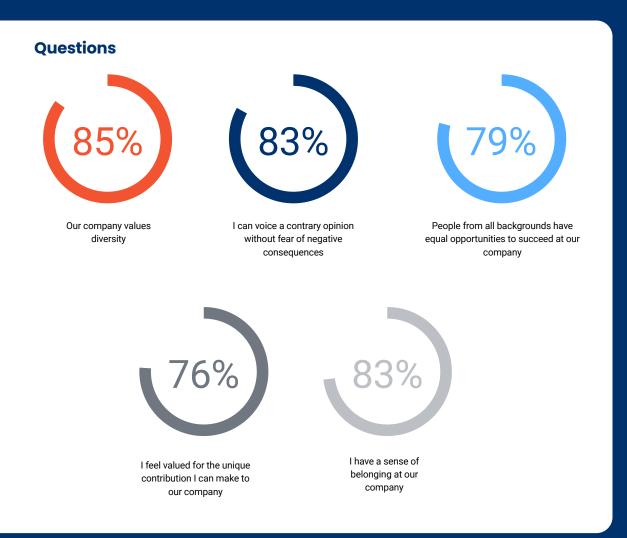
Our DEI goals include:

- · Committing to equal pay for equal work
- Achieving a gender ratio of 40:40:20 for Board, Senior Leadership Group and at the Group level.
- Training on our DEI Commitment and related topics as a requisite of core onboarding and refreshed annually for all.
- Implementing a Reconciliation Action Plan by November 2022.
- Establishing a calendar of cultural celebrations to recognise diversity of cultural traditions and celebration of cultural events internally.
- Conducting an annual review of People and Culture policies and processes to ensure alignment with DEI commitments.

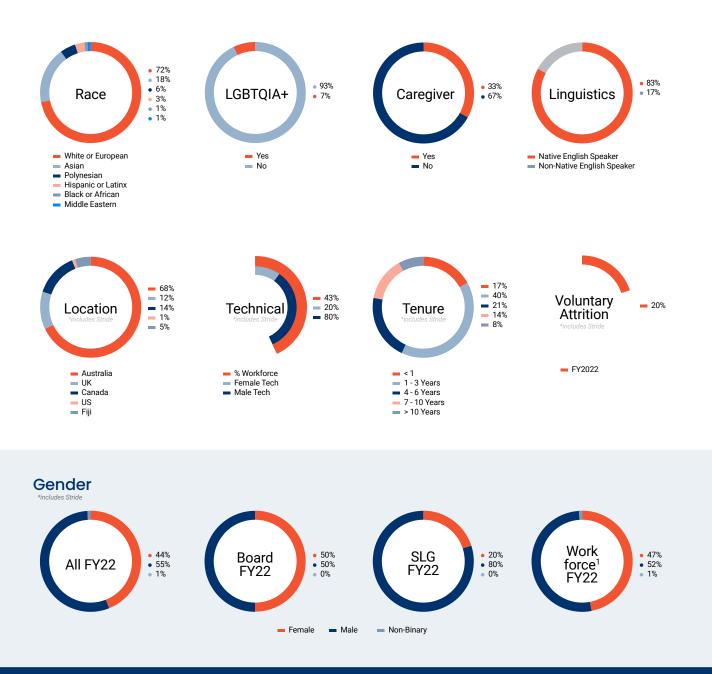
Data Collection

Data relating to DEI was captured as part of the 2021 Employee Engagement Survey. Ninety-one per cent (91%) of survey participants provided responses to questions about race, LGBTQIA+, caregiver status and linguistics. Given the sensitivity of this information, Jumbo was careful to explain the rationale for collecting this data and how we will care for it, while also being sensitive to those who prefer not to share. In 2022, we will begin using our applicant tracking system to capture DEI data from candidates on a voluntary basis. DEI data, combined with our Commitment to DEI, will help us to identify targeted actions and activities that will have the greatest impact and generate the most return on investment. In addition, this data will be used to enable us to take a more evidence-based approach to forming and refining our DEI strategy.

In addition to providing personal demographic data, employees were asked about Jumbo's commitment to DEI. Their responses (as shown below) provide a baseline against which we will measure the impact of our DEI strategy and initiatives in the future.



Demographic Data



Engagement

Engagement is about creating an environment where our employees feel a sense of belonging and are empowered to reach their full potential. Ensuring a strong emotional and relational connection through our culture, mission and goals drives our employees to go the extra mile.

Given our people are our greatest asset and a key source of competitive advantage, we constantly seek new and innovative ways to enhance our employee value proposition. Building a culture of engaged employees within our hybrid work model has been a determining factor in our success. We want our employees to feel heard and celebrated, and to have a sense of belonging.

To ensure connection and communication across our global employees, Jumbo has implemented an employee communication platform – Workvivo. Workvivo bridges communication gaps between leadership and the rest of the company, enables employees to interact and collaborate on common interests across locations and departments, and enables everyone to celebrate individual and team achievements across the organisation.

Here are some examples of how we engage our people:

- Operating as a remote-first company means our employees have the freedom to choose where they work. With 65% of our employees working remotely, employees are able to work from anywhere in the world for up to six months in any 12-month period.
- Monthly Town Halls hosted by our CEO and various members of the Senior Leadership Group provide an opportunity for transparency and connection. We share business updates, performance results, celebrate successes and recognise the achievements of our people.
- Managers are trained to provide real-time performance coaching for their employees. Quarterly 1:1 meetings are encouraged between manager and employee to discuss wellbeing, skills development, team and team member performance, and to exchange feedback and ideas.
- When in-office, our Brisbane-based employees eat together at our onsite kitchen, sharing stories, getting to know each other and creating connections across functions. Remote employees take advantage of our JumboEats program, having access to weekly virtual lunches sponsored by the company.
- Our salary review process ensures that our remuneration levels are competitive within each of our markets.
 Employees are provided with information about their salary band and how they can progress within the band.
 Career development plans provide employees with a path to build out their skills and experience to support their progression.
- Employees can showcase their skills by participating in our annual Hackathon. The Hackathon provides a platform for innovation, creativity and fun, and helps employees to form connections with colleagues outside of their immediate team.

Engagement Surveys

Listening to our employees helps us to identify ways to improve their experience and shows our people that their ideas and opinions matter. Engagement is measured using Culture Amp, a leading employee engagement tool.

In FY22, with 88% participation, Jumbo's employee engagement was 83%, which was ahead of an external industry benchmark of similar companies.

Jumbo has set a high target of being rated in the top quartile for both engagement scores and employee participation in the engagement survey so that we can be confident that we are delivering an outstanding employee experience.

We acknowledge that there may be fluctuations in our scores over the next 12 months as the company continues to work on the integration of our acquired businesses.

The graphs below show Jumbo's performance on employee engagement against an external industry benchmark of similar companies.

Table 1: Jumbo Employee Engagement Scores vs Benchmark



Table 2: Jumbo Engagement Questionnaire* vs Benchmark

*selection of questions only



By providing our people with opportunities to develop and advance, giving them a sense of purpose, and recognising their achievements, we have created a culture where people are engaged because they feel included, valued and respected

Benefits

Jumbo offers a range of benefits to support employee development and wellbeing.

Employee Assistance Platform including access to professional counselling services, training and weekly information sessions

Flexible working options - remote, in-office or hybrid Monthly reimbursement for wellbeing-related items

Paid parental leave for primary carers and paid partner leave

Focus on talent management, including access to career and skills development and performance coaching

Mobility opportunities, including lateral transfers, local and international secondments

A short-term incentive program that rewards employee contributions with an annual bonus, dependent on company performance

Family

Wellbeing

Career

Reward

Talent Management

Talent Attraction

Talent attraction initiatives at Jumbo seek to create and share value with both internal and external candidates, compelling the right person to apply for opportunities. Jumbo prides itself on the internal career pathways we offer our team, from internal mobility that looks at both physical location, project variety and team secondment, to internal succession into key roles.

External-facing activity includes the development of a global recruitment strategy, led by the newly appointed Talent Acquisition Lead. The Graduate Program welcomes eager talent at an entry-level and offers support, tools and continuous coaching to help them develop their craft. Unlike many other businesses, Jumbo welcomes graduates from a variety of learning pathways – not just tertiary-qualified candidates – for the diversity of thought and work-experiences they bring.

To share our practices, Jumbo partners with well-known organisations to strengthen and showcase our employer brand, including the Circle Back Initiative, Great Place to Work Organisation, and Flex Careers. To seamlessly manage our candidates across three regions, Jumbo uses JobAdder as an Applicant Tracking System (ATS), and Revelian to conduct aptitude testing in the recruitment process.

All talent attraction initiatives are underpinned by our DEI principles, fostering an inclusive culture that Jumbo employees are proud of.



Talent Development

As part of the Propel program launched in 2022, Jumbo implemented a career and skills development platform aimed at upskilling and empowering our employees. The Progression tool gives employees and managers insights into strengths and development areas, allows employees to track growth over time, powers one-on-one conversations with shared data, and most importantly supports our employees to grow their careers through a mapped-out progression plan. Purposeful training and understanding our peoples' career ambitions has led to a high rate of internal succession, with 38% of all vacant roles being filled through our internal talent pool.

Jumbo reviewed our succession framework and has identified critical talent and roles and high-potential employees. In FY23, we will strengthen our leadership skills through a formalised Leadership Framework made up of key elements including leading people, leading yourself and leading the organisation. In 2022, more than 75% of managers attended bi-monthly one-on-one coaching and mentoring sessions with an external training provider. These sessions provide an opportunity for managers to develop and hone specific skills that are essential for a good leader.

Plans are in place to expand our Propel program in FY23 to include a Jumbo University. The university will provide learning and development activities tailored to our employee's needs, including the delivery of companyspecific training, leadership development and a global onboarding program. The aim of the University is to upskill and reskill our people, reinforce our culture, support innovation and boost retention through progression into leadership and employee engagement.

Our comprehensive onboarding program will provide the best possible start for employees by providing in-depth knowledge of our core values, operating segments, organisational structure, product and engineering principles, systems, tools and processes, and much more. We anticipate the onboarding program will support employees from newly acquired companies to feel a greater sense of belonging and inclusion at Jumbo, and reinforce the key role they play in the achievement of our corporate strategy.

Jumbo seeks to create and share value with both internal and external candidates, compelling the right person to apply for opportunities.

Supporting our communities

In addition to providing products and services that enable community and grass-roots organisations to raise funds, we are committed to enacting positive change in the communities in which we operate. Our Grants and Sponsorship program is built on the foundation of inclusivity with a focus on increasing participation and enhancing their digital exposure.

In 2018, Mike Veverka and Rebecca Paul (President of the World Lottery Association) announced the foundation donation to the "Women in Lottery Leadership" program to drive high performance growth by supporting the advancement of women in top positions on lottery management, leadership and responsibility. In addition, Jumbo is a partner of the Woman in Digital initiative which is focused on recognition, learning and development and personal growth for women who work in the digital sector.

Jumbo is proud to be an official partner of the Australian Paralympics Team. Paralympics Australia's goal of **Making Australia a more inclusive society** and the core values of **Resilience, Adversity and Tenacity** embodies those qualities that our grants and sponsorship program strive to achieve.









Left: Para-swimming | Tokyo 2020 Paralympic Games | Day 6

Community support and volunteering



Above: Jumbo Chair, Susan Forrester, helping flood-impacted communities in Lismore with the recovery and rebuilding process

In early 2022, communities across southeast Queensland and northern New South Wales faced one of the worst flooding disasters on record. Thousands of families were displaced from their homes, communities were left isolated, and properties destroyed. In a bid to support those in need, Jumbo employees, their families, and members of their local community rallied together to donate essential goods and supplies.

Mike Veverka, CEO and Founder of Jumbo, organised for the donated goods – food, water, clothing, bedding, cleaning products, pet food and medical supplies – to be delivered to some of the worst affected regions across northern New South Wales. The level of support from the Jumbo team was overwhelming with Mike making several trips to the





donations distribution centre in Lismore. Volunteers on the ground, including the army, helped to unload, sort and store supplies so that flood-affected members of the community could come in to collect the items they needed.

In the weeks following the flooding, Mike was also joined by our Chair, Susan Forrester, in transporting additional supplies including tools and building supplies to help speed up the recovery and rebuilding process.

Left: Lismore Donations Distribution Centre

Left: Volunteers helping unload essential supplies

Governance

Risk management

Approach

Jumbo applies the principles of the three lines model to deliver robust risk management and corporate governance to our business and its operating segments and subsidiaries.

Our Board have delegated responsibility for setting our Risk Framework, risk appetite and the Risk Management Policy to guide our business strategy to the Audit and Risk Management Committee (ARC). Each month, we report key risk movements, including both bottom-up operational risks and top-down strategic risks, to the Board and the ARC. Environment, Social and Governance (ESG) risks are also assessed, measured and monitored as we are striving for continual improvement in these spheres.

Jumbo is focused on the key risk areas identified below:

INTERNATIONAL STRATEGY SUSTAINABILITY PEOPLE AND REGULATORY DATA PROTECTION CULTURE **ENVIRONMENT Ensuring longevity** Ensuring adequacy Undertaking Attracting, Ensuring of safeguards to protect compliance with adequate due developing and of our operations state, territory, retaining talented diligence and by prioritising player, partners employees and and federal assessing initiatives and and employee creating an legislation across opportunities to confirming the information. engaging and the international de-risk resourcing. appropriateness safe workplace markets in which of response. environment. we operate.

Governance Framework

Strong and effective corporate governance is an integral part of how we do business. We continue to optimise our Risk Management Framework to ensure it is robust and scalable for our diverse operating segments and subsidiaries. The diagram below represents Jumbo's Corporate Governance Framework and decision-making flow.



Jumbo is committed to acting with ethics and integrity in all we do. Our Core Values and <u>Code of Conduct</u> underpin our culture to ensure Jumbo's workplace is a safe environment for all employees.

The Group's Governance Framework also encapsulates the policies and statements that outline expectations for employees and Directors including:

- Whistleblower Policy
- Anti-Money Laundering and Counter-Terrorism Financing Policy
- Privacy policies
- Corporate Governance Statement
- · Continuous Disclosure Policy
- Share Dealing Policy
- · Diversity Policy
- Communications Policy
- · Anti-bribery and Corruption Policy

Group-level policies undergo an annual multi-tiered review to ensure they remain relevant, are complied with and are approved by the Board.

Oversight of our subsidiaries is directed by the Subsidiary Governance Policy which outlines the approach, aspirations, duties and responsibilities and risk monitoring as determined by the Board.

The Board are responsible for the following governance matters.

- Overseeing Jumbo, including its control and accountability systems.
- Appointing, monitoring, reviewing performance and, if necessary, terminating employment of the Chief Executive Officer, the Chief Financial Officer and the Company Secretary.
- Contributing, assessing and final approval of management's development of corporate strategy and performance objectives.

- Reviewing and ratifying systems of risk management and internal compliance and control, codes of conduct, and legal compliance.
- Monitoring senior management's performance and implementation of strategy, and ensuring appropriate resources are available to undertake those strategies.
- Approving and monitoring the progress of major capital expenditure, capital management, acquisitions and divestitures.
- Approving and monitoring financial and other reporting (including audit matters).
- Recruiting, remunerating, reviewing performance and succession plans for the Company's Board.
- Ensuring adherence to a high ethical standard and integrity in how we operate.
- · Overseeing the Sustainability Framework and Strategy.

The Board comprises three non-executive and independent Directors and one executive Director, who hold technical, financial and managerial expertise. Composition of the Board is reviewed annually to ensure an appropriate mix of skills and experience to lead the Group. The PCC have reviewed and confirmed the independence of the Directors.

The Chair is responsible for ensuring Directors have completed the relevant training and education to discharge their duty. Incoming Directors undertake an induction and orientation program to ensure they are equipped to make a valuable contribution to the Board. From time-to-time subject matter experts are engaged to provide consultation to the Board to assist in decision-making.

The Board has delegations to two Committees: the ARC and the PCC (Formerly Nomination and Remuneration Committee). These additional layers of oversight provide strong focus on the key risk areas identified below.

People & Culture Committee

- Nomination & Remuneration
- Diversity & Inclusion
- Gender Equality
- Culture

Audit & Risk Management Committee

- Risk Management
- Whistleblowing
- Accounting & Financial Reporting
- Internal & External Audit
- Compliance

Internal Audit provides independent assurance of the financial and non-financial control environment and governance processes. The Internal Audit Charter provides the framework for the conduct of the Internal Audit function and is subject to annual review. The Head of Risk, Compliance and Internal Audit has a direct reporting line to the Audit and Risk Management Committee and attends all Committee meetings.

The External Auditor is appointed by the Board and is subject to routine engagement-partner rotation and provider review to ensure the independence and quality of the Audit and related outputs.

Culture, ethics and trust

Developing and maintaining a strong, consistent culture is one of our key strengths and critical to our future success.

Our ethics and culture are steered by our Code of Conduct and our Core Values. The Code of Conduct underscores respect for the law, our stakeholders and the environments we operate in. The Code deals with conflicts of interest and ethical matters such as acting with integrity, exercising due care and diligence in fulfilling duties, acting in the best interests of Jumbo and respecting the confidentiality of all sensitive corporate information.

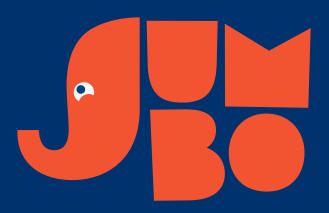
Empowering people to speak up against wrongdoing is a central element of Jumbo's approach to good business ethics and doing the right thing. If a Director or officer becomes aware of unlawful or unethical behaviour by anyone in the company then they are obliged under the Code to report such activities. Reports can be made directly to the Chair or anonymously through an independent external whistleblowing channel, BDO Secure, as well as through Jumbo's internal channels. The effectiveness of Jumbo's whistleblowing arrangements is reviewed annually by the ARC.

Impacts of COVID-19

The effects of COVID-19 have been profound on our communities.

- Our People: We transitioned to a remote-first work environment to protect our employees and respond to changing Government directives efficiently. Feedback from our employees about these flexible work arrangements has been overwhelmingly positive.
- Our Business: We operate with a predominantly digital supply chain and have experienced minimal disruption to our business operations. Increased digital activity also increases our risk of exposure to cybercrime and threats to our cyber security.
- Our Partners: Lotteries have become critical to the survival of our charity partners as COVID-19 has adversely affected their ability to generate income from traditional fundraising channels.
- Our Players: With an almost exclusively digital product offering, our existing players' access has not been affected by lockdowns and stay home directives. Our product has provided a safe transition to digital for new players converting from traditional newsagent channels due to COVID-19 mobility restrictions.
- Our Industry: Mobility restrictions have seen a shift in consumer behaviour to online which has driven an increase in players to our digital lottery offerings.

For additional information, please see our Corporate Governance Statement available on our website here



Regulatory environment

Jumbo is committed to managing our compliance risk in our sector's complex regulatory environment and ensuring our conduct meets regulator and community expectations.

In addition to taking measures for general corporate compliance, Jumbo works closely with The Lottery Corporation and the Western Australia Lottery Commission and follows the Codes and Regulations of the Australian States and Territories to help ensure compliance with best practice in the Australian gaming industry. Similarly, the relevant Jumbo entities are licensed by the UK Gambling Commission and hold the applicable licences or certifications from the gaming regulators in the Canadian provinces in which Stride operates.

Jumbo dedicates internal and external specialist resources to ensuring that the company:

- Understands the global regulatory landscape in which we operate – including country and state-specific differences
- Establishes processes for our business practices which facilitate compliance, and
- Monitors and reacts to developments in the regulatory space.



Areas of focus include:

- Responsible gaming / responsible gambling codes of practice and licensing requirements
- Data security and privacy
- Fraudulent payments
- Anti-money laundering and counter-terrorism financing
- Sales and marketing practices
- Procurement practices
- Anti-bribery and anti-corruption
- Continuous disclosure
- Share trading, and
- · Whistleblower protections.

Data protection, privacy and cyber risk

We are investing continuously to enhance the security and safety of our systems and platforms to protect the data shared with us by our players, partners and employees.

Data privacy

For our lottery platforms, we collect, use and hold data relating to our partners and their customers, including account, card-holder and transactional data. Our Privacy Policy can be found here: <u>https://www.jumbointeractive.com/privacy-policy</u> and details how we undertake these responsibilities and comply with privacy laws.

In the event of a potential privacy breach, we have a Data Breach Notification Policy and a response plan and processes in place to ensure that these events are identified, assessed and managed in a timely and effective way. All data security attacks are reported to our Risk Team. Significant and notable cyber-security events (both successful and unsuccessful) that result in public disclosure are declared in this Sustainability Report. For FY22 there were no reportable data breaches.



Data security

We adopt a risk-based approach to cyber security to identify and manage key risks. To protect the data of the Group, we have robust controls in our Information Security Management System Framework (ISMS). We make use of technology platforms to host systems that hold confidential data relating to customers and our partners. Through the processes, policies and controls established in our ISMS, we focus on protecting the confidentiality, integrity and availability of this data. We have cross-functional teams with technical, legal and compliance experience as well as the use of specialised third-party service providers to undertake extensive data security measures including:

- Firewalls
- · Vulnerability scanning
- · Penetration testing and monitoring
- · Network segregation and system isolation
- Role-based access controls and access on a need-toknow basis
- · Multi-factor authentication
- · Physical security perimeters
- · Cyber security awareness training, and
- · Cyber-attack simulation and response exercises.

We have adopted an enhanced cybersecurity posture in response to the Australian Cyber Security Centre (ACSC) recommendation.

In addition to this, we audit the PBJ SaaS platform annually (rotating between foundational and surveillance audits) to maintain the ISO27001 Information Security Management System certification. Jumbo continues to improve our security posture to withstand the ever-growing risks of cyber-attacks in Australia and internationally. We also work with our suppliers to ensure that they have necessary data security controls in place.

Jumbo continues to improve our security posture to withstand the ever-growing risks of cyber-attacks in Australia and internationally.

Sustainable supply chain

In FY2022 we have developed a three-year modern slavery roadmap to prevent Human Rights abuses in our supply chain. We are committed to better understanding and investigating our supply chain in its entirety.

The roadmap identifies risks and creates a control framework which can be expanded as we mature. We will issue a Modern Slavery Statement for FY2022 by 31 December 2022 in accordance with the Modern Slavery Act 2018 (Cth).

Jumbo is an international business with a SaaS product as our key offering. Our supply chain relationships are predominantly with information, communications and technology suppliers based in low-vulnerability countries (as identified in the Walk Free 2018 Global Slavery Index).

As this will be our first report on modern slavery, we have concentrated efforts on reviewing both our major suppliers and those suppliers identified as high risk by their industry or region. We are working to review and engage with these key suppliers to develop a supplier code of conduct. Collaborating with suppliers enables us to build strong relationships and a shared expectation of a sustainable and ethical supply chain.

Looking forward, we have plans to refine our procurement program and Supply Chain Framework to minimise modern slavery, controversial sourcing and reduce our environmental footprint.

Environment



Environmental sustainability

Recent global weather events have demonstrated the significant impact that climate change is having on our communities and the sustainability of businesses. Given the enormity of this challenge, reducing carbon emissions is a business imperative.

Our commitment to environmental sustainability runs through our entire business. The Board is committed to transitioning Jumbo's Australian operations to a net zero carbon footprint by 30 June 2026 with international operations to follow through:

- · A targeted reduction in our direct consumption of resources
- · Investments in carbon offset projects
- Carbon baselining and offset initiatives developed with industry groups, and
- Enhanced procurement processes that take environmental impacts into consideration (both purchasing and real estate decisions).



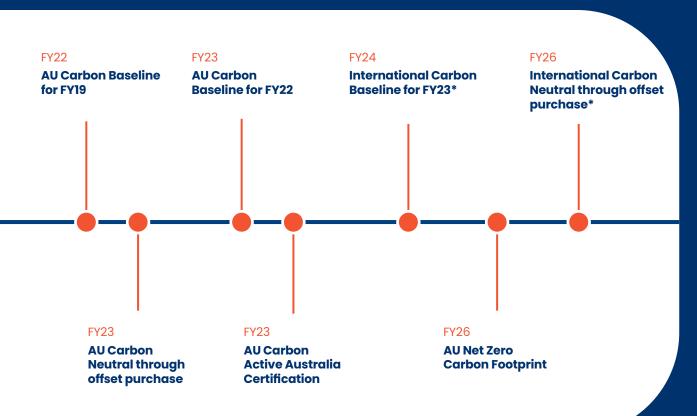
FY2019 Carbon Baseline



Jumbo is proud to be working with trace on its carbon positive journey beginning with preparing a carbon baseline for our Australian operations for FY19. trace has developed its programs using internationally recognised methodologies in calculating carbon emissions, and is based on Climate Active, NABERs and GHG Protocol methodology and uses emissions factors and benchmark data from auditable public sources. During FY23, Jumbo will conduct a second carbon baseline assessment of Australian operations for FY22 to ensure an accurate carbon baseline of "new normal" operations is captured, following the disruption of COVID-19, which saw an impact to operations in FY20 and FY21. Once the "new normal" FY22 carbon baseline is established, Jumbo will be in a better position to consider additional programs beyond carbon offsets, and effect genuine reductions and targets and broaden the scope to include international operations.

Carbon offset timeline

With a goal to achieve immediate impact, Jumbo has implemented a stepped approach to having a net zero carbon footprint for following its carbon baseline project.



*For completed international subsidiaries

Targets

To provide transparency about Jumbo's response to environmental risks, we will report on three Greenhouse gas emissions 'scopes' as categorised by the Greenhouse Gas (GHG) Protocol.

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- Scope 1 covers direct emissions from owned or controlled sources, which does not apply to Jumbo.
- Scope 2 covers indirect emissions from the generation of purchased electricity, steam, heating and cooling consumed by the reporting company.

Scope 3 includes all other indirect emissions that occur in a company's value chain. Noting the impact of COVID-19 on business operations and resulting carbon emissions, Jumbo has set the following environmental targets for 2026, with a stepped approach to immediate reductions as detailed in the "Environmental Performance" section below

Category	FY19 Baseline	2023 Target	2026 Target
Scope 1 emissions	Not applicable Jumbo does not have any Scope 1 emissions		
Scope 2 emissions	3.1 tonnes CO2e/FTE	25% reduction from FY19 baseline	25% reduction from FY22 baseline
Scope 3 emissions	5.2 tonnes CO2e/FTE	20% reduction from FY19 baseline	20% reduction from FY22 baseline
Carbon footprint			Net Zero MTCO2e
Energy Usage			25% reduction from FY22 baseline
Renewable energy as a % of total energy			100%
Water usage			25% reduction from FY22 baseline
Paper usage			25% reduction from FY22 baseline

Actions



Use of renewable energy

-14

In the coming years, we will reduce our dependence on fossil fuel sources and increase our consumption of renewable energy by working with our energy supplier and landlords. Any real estate leasing going forward will include this metric by preferring locations with green certifications. Aligned with our commitment to a net zero carbon footprint, our target is to acquire 100% of our energy needs from renewable sources by 2026.

Recycling

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We are committed to improving our current recycling methods and introduce a recycling bin service with a thirdparty supplier for paper, glass, hard plastic and aluminium. We are committed to sourcing all paper for office printers and terminals from recycled sources, and we will continue to recycle consumables such as toner cartridges and batteries through certified e-waste companies. Notably, Jumbo has teamed up with Yeerongpilly e-Waste Connection, a certified e-waste company, for e-waste recycling.

Reduction of electricity usage

We are working on setting specific targets to lower electricity consumption in Jumbo's offices. Starting in the Queensland Head Office, Jumbo aims to reduce consumption by 25% per employee from the baseline set on 30 June 2022. This program will be rolled out to all other offices by FY23. When renewing office leases, Jumbo also requires landlords provide renewable energy and other sustainability measures. Additionally, the Jumbo Sustainability Team actively identifies energysaving opportunities to help reach our emissions targets.

Supplier engagement



Although Jumbo does not manufacture any physical goods, the sustainability of each of our suppliers impacts our emissions outcomes. As our top-emitting supplier categories are data centres and computer manufacturing, we are looking to work with our suppliers to help them become more environmentally conscious as well. For example, we are introducing a new collaborative approach to supplier sustainability by adding a sustainability rating to our supplier evaluation process, and looking to introduce a compulsory emissions reporting process for our material suppliers.

Employee commuting



Jumbo's Head Office provides end-of-trip facilities to all employees to support environmentally-friendly modes of commuting. These facilities include secure bike parking, showers, and changing rooms. Additionally, the office is within short walking distance to train, bus and ferry terminals. Jumbo also offers a flexible workfrom-home program, which reduces emissions from employee commutes.

Employee engagement



The Jumbo Sustainability Team works with all Jumbo employees in our efforts to be a more sustainable company. Engagement includes targeting the elimination of damaging plastic waste, encouraging recycling, responsible energy, water and paper usage and encouraging new ideas on how Jumbo can be a more environmentally-responsible company.

The Sustainability Team is using the trace employee campaign to engage and educate employees about our sustainability programs. Additionally, the Sustainability Team is working with Yeerongpilly e-Waste Connection to create a structured program for Jumbo employees to have hands-on engagement through their volunteer program.

Data centre storage



CO

Jumbo uses the Equinix platform as our data centre providers. Equinix has a long-term goal of using 100% clean and renewable energy in its global infrastructure by designing, building, and operating their data centres with high energy-efficiency standards. In 2021, Equinix achieved 90% renewable energy usage.

Environmental performance – the journey to net zero

To better understand the impact of Jumbo's operations on the environment, we have engaged trace to undertake a full assessment of our carbon footprint in Australia using our Scope 2 and 3 emissions from FY19. Pre-pandemic data will provide a realistic and accurate assessment of our carbon footprint under normal operating conditions, enabling meaningful and genuine target reduction.

As the business expands globally, Jumbo will extend its assessments and reporting to include overseas operations as they come online.



Jumbo Interactive Limited

Level 1, 601 Coronation Drive PO Box 824 Toowong, Queensland, 4066 Australia +61 7 3831 3705 www.jumbointeractive.com