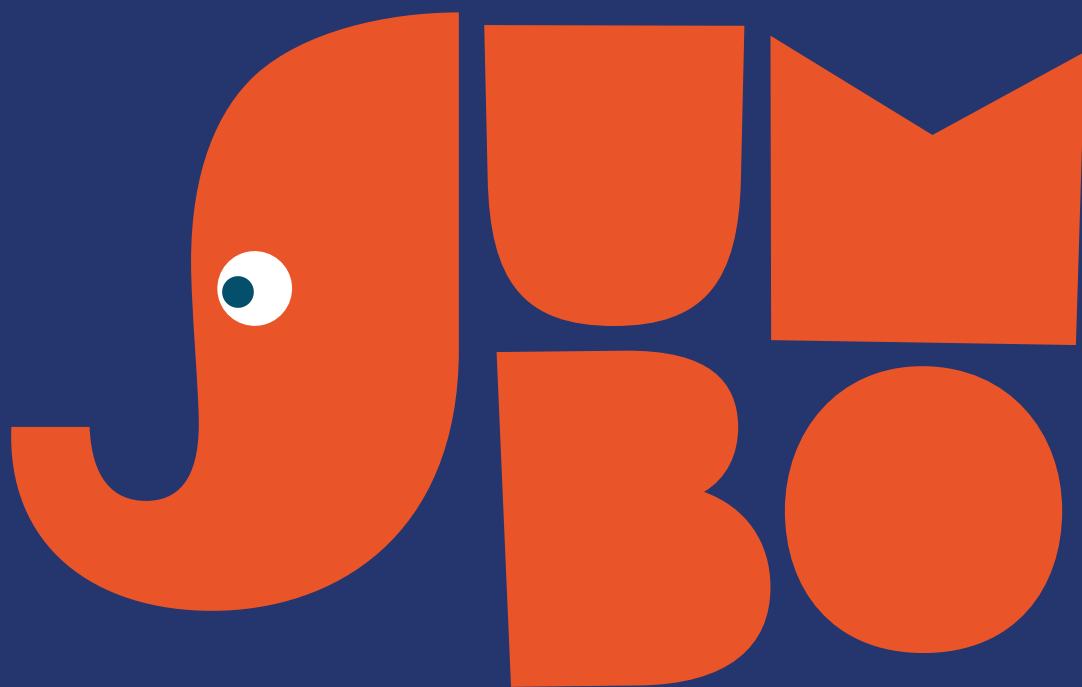


Modern Slavery Statement 2023



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Acknowledgment of country

Jumbo would like to acknowledge the Turrbal and Yuggara People, the traditional custodians of the land on which our global business was founded. We pay our respects to elders past and present, the keepers and storytellers of First Nations customs and culture.

Across the seas, we would also like to acknowledge the Blackfoot Confederacy, including the Siksika, Piikani and Kainai Nations; the Stoney-Nakoda Nation; and the Tsuut'ina Nation, upon whose land our subsidiary, Stride Management Corp, operates.

Jumbo commissioned this digital artwork by Aboriginal and Torres Strait Islander artist Chad Briggs.



Australian and UK Joint Modern Slavery Statement 2023

This Joint Modern Slavery Statement documents the actions taken by Jumbo Interactive Limited (**Jumbo, we, us, our**) and its subsidiaries (**Group**) to identify and prevent potential modern slavery and human trafficking in our supply chain and operations for the period 1 July 2022 to 30 June 2023 (**reporting period**).

This is a joint statement made in accordance with Section 14 of the *Modern Slavery Act 2018* (Cth) (**Australian MSA**) and Section 54 of the *Modern Slavery Act 2015* (United Kingdom) (**UK MSA**). A table setting out how this statement addresses the Australian MSA and UK MSA reporting criteria is set out below:

Australian MSA mandatory reporting criteria	UK MSA recommended reporting criteria	Reference in this Statement
Identify the reporting entity	N/A	Section 1
Describe the reporting entity's structure, operations and supply chains.	Organization's structure, its business and its supply chains	Section 1
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity and any entities it owns or controls.	Parts of the organization's business and supply chains where there is a risk of slavery and human trafficking taking place, and the steps it has taken to assess and manage that risk.	Section 2
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Organization's policies in relation to slavery and human trafficking; its due diligence processes in relation to slavery and human trafficking in its business and supply chains; the training about slavery and human trafficking available to its staff.	Section 3
Describe how the reporting entity assesses the effectiveness of such actions.	Organization's effectiveness in ensuring that slavery and human trafficking is not taking place in its business or supply chains, measured against such performance indicators as it considers appropriate.	Section 4
Describe the process of consultation with (i) any entities the reporting entity owns or controls; and (ii) for a reporting entity covered by a joint statement, the entity giving the statement.	N/A	Section 5
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	N/A	Section 6

The Modern Slavery Statement 2023 is available at <https://www.jumbointeractive.com/investors/>

1. Jumbo's structure, operations and supply chains

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

Jumbo was founded by Chief Executive Officer (**CEO**) Mike Veverka in 1995 with a single computer and listed the business on the ASX in 1999. Since then, it has matured into a leading digital lottery retailer and lottery software provider with 252 skilled employees (as at the end of the reporting period) across Australasia, the United Kingdom (**UK**) and Canada.

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

Australasia	United Kingdom	North America
Benon Technologies Pty Ltd (Aus)	Gatherwell Limited	Stride Management Corp. (Canada)
TMS Global Services Pty Ltd (Aus)	Jumbo Interactive UK Limited	Jumbo Interactive North America, Inc. (North Carolina, USA)
TMS Global Services (NSW) Pty Ltd (Aus)	Starvale Technical Systems Ltd	Jumbo Interactivo de Mexico SA de CV (Mexico)
TMS Global Services (VIC) Pty Ltd (Aus)	Starvale Management & Technologies Ltd	
Jumbo Lotteries Pty Ltd (Aus)	DDPay Ltd	
Jumbo Interactive Asia Pty Ltd (Aus)		
TMS (Fiji) Pte Limited (Fiji)		
TMS (Fiji) On-Line Pte Limited (Fiji)		
TMS Global Services (PNG) Limited (PNG)		

Jumbo has three distinct operating segments underpinned by our proprietary lottery software platform and over 25 years of proven lottery management expertise. The three operating segments, along with Group functions related to business support, advice and administration are as follows:

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

For additional details on our business and operations, please see Jumbo's Annual Report, available on our website at <https://www.jumbointeractive.com/investors/annual-reports/> and our Sustainability Report on our website at <https://www.jumbointeractive.com/about-us/sustainability/>.

2. Modern slavery risks in the reporting entity's operations and supply chains

We continued to assess modern slavery risk in our operations and supply chains during the reporting period using two considerations, namely reviewing top suppliers by spend (**key suppliers**) and then identifying suppliers who may be considered as being higher risk due to the jurisdiction or industry in which they operate or the product or service they supply. Following the finalisation of business acquisitions in Canada and the UK, this assessment is undertaken across all businesses within the Group.

Our key suppliers represent large, multinational technology, marketing and professional services businesses who generally employ a skilled workforce. Despite the level of skill of a key supplier's workforce, we appreciate the potential for second tier risk from some key suppliers, particularly those within the technology space, given the breadth of their workforce across numerous jurisdictions. However, following an assessment during the reporting period of these key suppliers' approach to modern slavery risk mitigation, the nature of the product they supply and the jurisdiction and industry within which they operate, we have assessed that the residual risk of modern slavery in our direct business operations from key suppliers to be low.

In respect of other suppliers, we continue to acknowledge that exposure to modern slavery risk in our supply chain may be higher due to the jurisdiction or industry in which those suppliers operate or the product or service they supply. This increased risk is primarily concentrated within suppliers who support our Group function and during the reporting period we have found suppliers identified as having medium risk of modern slavery, or potential second tier risk, within the following areas of supply:

- Food, beverage, and kitchen consumables;
- Technical employee outsourcing arrangements;
- Ticket printing; and
- Computer and technical equipment providers.

However, we have assessed that the residual risk of modern slavery in our direct business operations from other suppliers to be low.

3. Actions taken to assess and address modern slavery risks

Following Jumbo's first Modern Slavery Statement in 2022 and the implementation of a three-year roadmap for identifying and minimising modern slavery risk in our supply chain, we have made progress within this reporting period by focussing on maturing and embedding policies and procedures within our businesses. During the reporting period, we have undertaken the following initiatives across the Group:

1. Mapped the upstream supply chains for Stride Management Corporation, our Canadian businesses which was acquired in June 2022.
2. Developed and introduced a new supplier onboarding process inclusive of a consideration of risk of modern slavery (including assessment of the jurisdiction or industry in which they operate or the product or service they supply).
3. Implemented standardised training on modern slavery risk for employees of the Group.
4. Reviewed our Whistleblower Policy, Anti-Bribery and Corruption Policy, Workplace Health and Safety Policy and Code of Conduct to ensure they align with modern slavery risk mitigation practices.
5. Adopted the use of a third-party whistleblower reporting service as a mechanism for raising grievances regarding modern slavery.

4. Assessing the effectiveness of actions taken

During the reporting period, we sought to measure the effectiveness of the initiatives introduced to manage modern slavery risks through the following means:

- Audit trails and reporting statistics on the implementation and completion of modern slavery risk training for relevant employees.
- Creation of supplier register which tracks new suppliers across the Group.
- Binding requirement for the provision of supplier identification numbers within the contracting process, indicating that the supplier has been assessed against the supplier onboarding process.
- Implementation of a review process for legacy suppliers to ensure sufficient consideration of modern slavery risk is included when re-engaging legacy suppliers.
- Continuous monitoring and assessment of controls by the Internal Audit team.

5. The process of consultation with subsidiary entities in preparing the modern slavery statement

During the reporting period, we engaged with key stakeholders within operating subsidiaries such as members of the Legal, Risk, Finance, Product, Operations, and Infrastructure teams to better understand their relevant supply chains and identify key suppliers, including those within our recently acquired (for the purposes of this reporting year) Canadian subsidiary. This included an assessment of legacy suppliers and the creation of a heat map of suppliers' modern slavery exposure based on jurisdiction or industry in which they operate or the product or service they supply.



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