

Modern Slavery Statement 2024



For the year ended 30 June 2024
Jumbo Interactive Limited
ABN 66 009 189 128

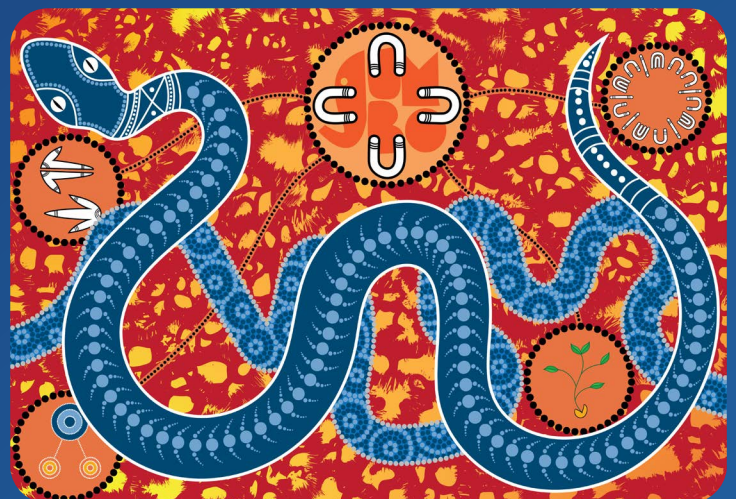
Introduction

Australian, UK and Canada Joint Modern Slavery Statement 2024	3
1. Jumbo's structure, operations and supply chains	3
2. Modern slavery risks in the reporting entity's operations and supply chains	4
3. Actions taken to assess and address modern slavery risks	5
4. Assessing the effectiveness of actions taken	6
5. The process of consultation with subsidiary entities in preparing the modern slavery statement	6

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, UK and Canada Joint Modern Slavery Statement 2024

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 2023 to 30 June 2024 (**reporting period**).

This is a joint statement made in accordance with Section 14 of the Modern Slavery Act 2018 (Cth) (**Australian MSA**), Section 54 of the Modern Slavery Act 2015 (United Kingdom) (**UK MSA**) and Section 11 of the Fighting Against Forced Labour and Child Labour in Supply Chains Act (**Canada SCA**). A table setting out how this statement addresses the Australian MSA, UK MSA and Canada SCA reporting criteria is set out at Appendix 1.

The Modern Slavery Statement 2024 is available at <https://www.jumbointeractive.com/investors/latest-news/>

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 Managing Director and 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 over 250 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 primarily assessed modern slavery risk in our operations and supply chains during the reporting period using two methods, 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. For purposes of this report, modern slavery includes human trafficking, forced labour and child labour, and other slavery-like, exploitative or coercive labour practices as defined in the Australian MSA, the UK MSA, and the Canada SCA, respectively and as applicable.

Our key suppliers represent large, multinational technology, marketing and professional services businesses who generally employ a skilled workforce. Notwithstanding the level of skill of our key suppliers' workforce, there remains potential for second tier risk from some key suppliers, particularly those within the technology space given the spread of their workforce across numerous jurisdictions. 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.

Similar to previous years, in respect of other suppliers there remains a higher risk of exposure to modern slavery 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

During the reporting period, we have undertaken the following initiatives across the Group to embed policies and procedures which to assess and address modern slavery risk within our businesses:

1. Implemented compulsory modern slavery training through our online educational hub for all employees.
2. Collected information on modern slavery in our supply chain through our established supplier engagement process.
3. Continued to monitor information collected on modern slavery in our supply chain through our established supplier engagement process.

In 2024, we did not identify any specific instances of forced labour or child labour in our activities and supply chains and therefore situation-specific remediation was not required. We also, accordingly, did not identify any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

We continue to provide access to a confidential whistleblower service for individuals to report any concerns regarding Jumbo's exposure to modern slavery risk; for the reporting period, we did not receive any whistleblower reports related to modern slavery or any other aspect of Jumbo's business.

Looking forward, we will continue to assess third party tools to measure, assess and address risks of modern slavery within our supply chain, broadening the effectiveness of our existing processes.

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.
- ✓ Full implementation and integration of a supplier register and process which tracks new suppliers across the Group.
- ✓ 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 function.

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.

Approval

For the purposes of the Australian MSA and UK MSA, this statement was approved by the Board of Jumbo on 28 November 2024 and is signed by Mike Veverka, Managing Director, CEO and Founder of Jumbo Interactive.



Mike Veverka

Managing Director, CEO and Founder

In accordance with the requirements of the Canada SCA, and in particular section 11 thereof, I attest that I have reviewed the information contained in the statement for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the statement is true, accurate and complete in all material respects for the purposes of the Canada SCA, for the reporting year listed above. I have the authority to bind Jumbo.



Mike Veverka

Managing Director, CEO and Founder

28 November 2024

Appendix 1

The table below identifies where in the statement we have addressed the respective criteria under the Australian MSA, UK MSA and Canadian SAC.

Australian MSA mandatory reporting criteria	UK MSA recommended reporting criteria	Canada SCA reporting elements	Reference in this Statement
Identify the reporting entity	N/A	N/A	Section 1
Describe the reporting entity's structure, operations and supply chains.	Organization's structure, its business and its supply chains	Entity's structure, activities and 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.	The parts of an entity's business and supply chains that carry a risk of forced labour or child labour being used 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.	<p>Steps the entity has taken during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods in Canada or elsewhere by the entity or of goods imported into Canada by the entity.</p> <p>The entity's policies and its due diligence processes in relation to forced labour and child labour.</p> <p>Any measures taken to remediate any forced labour or child labour.</p> <p>Any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains.</p> <p>The training provided to employees on forced labour and child labour.</p>	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.	How the entity assesses its effectiveness in ensuring that forced labour and child labour are not being used in its business and supply chains	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	N/A	Section 5
Include any other information that the reporting entity, or the entity giving the statement, considers relevant.	N/A	N/A	Section 6