

Modern Slavery Statement 2025



For the year ended 30 June 2025
Jumbo Interactive Limited
ABN 66 009 189 128

Introduction

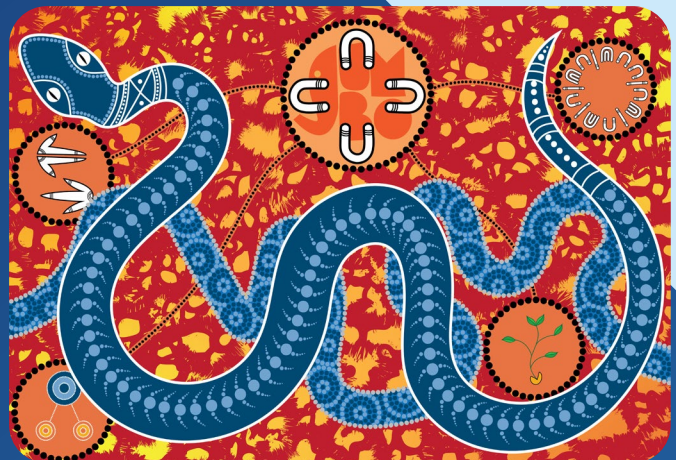
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Acknowledgement of country

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 2025

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 2024 to 30 June 2025 (**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**). While Jumbo previously reported its activities within Canada under the Fighting Against Forced Labour and Child Labour in Supply Chains Act (Canada SCA), Jumbo nor its subsidiaries no longer meet the criteria to prepare an Annual Report under the Canada SCA. However, to ensure consistency across the Group, we have included our activities in Canada within this report as part of our efforts to identify and prevent potential modern slavery and human trafficking in our supply chain.

A table setting out how this statement addresses the Australian MSA and UK MSA reporting criteria is set out in Appendix 1.

The Modern Slavery Statement 2025 is available at <https://www.jumbointeractive.com/investors/latest-news/>

Section 1

Our structure, operations and supply chain

Our structure

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

Our operations

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	Number of staff
Lottery Retailing	Jumbo is an authorised digital reseller of Australian lottery tickets through Oz Lotteries and operator selling instant scratch tickets in Fiji.	33
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.	64
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.	115
Group functions	Direct employment of Legal, Finance, Sales, Marketing, Risk and People & Culture employees.	48

Jumbo's employee profile is broken down into the following as at 30 June 2025:

Country of Operation	Office Location	Number of staff ¹	% Permanent Employees	% Contractor Employees
Australia	Brisbane	135	>99%	<1%
United Kingdom	Manchester; Lancaster	96	100%	0%
Canada	Calgary	26	96%	4%

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/>.

1. Three employees are based in Fiji, accounting for 260 total employees at the Group level.

Our supply chain

Our supplier process has captured 42 new Group suppliers in FY25 across all operating segments. Our operating segments and associated supply chain are outlined below.

Operating segment	Associated Supply Chain
Lottery Retailing	Jumbo staff, third-party technology and cloud storage vendors, lottery vendor, ticket printing and transportation.
Software-as-a-Service	Jumbo staff, third-party technology and cloud storage vendors.
Managed Services	Jumbo staff, third-party technology and cloud storage vendors.
Group functions	Office space and associated costs including utilities, cleaning, technology, stationary, postage, kitchenware, food and beverage consumables, uniform and branded merchandise, external professional advisors and service providers (lawyers, auditors, accountants, payroll). Other associated suppliers are outlined in Section 2.

Section 2

Identifying modern slavery risks

Governance

Jumbo Group has established governance processes that consider modern slavery across all levels of senior leadership. Our systems and processes are reviewed annually to ensure we are compliant with latest regulations and seek continuous improvement.

Board of Directors

Responsible for overseeing modern slavery risk for Jumbo. This includes approving key policies, standards, statements and activities as they pertain to modern slavery. The Board receives regular updates on modern slavery matters through monthly meetings.

Executive leadership team

Chief Financial Officer is the key sponsor.

Audit and Risk committee

A supporting body that is responsible for overseeing modern slavery compliance and activities. The includes overseeing processes and whistleblowing complaints (if they occur). The committee receives regular updates on modern slavery matters through quarterly meetings.

Sustainability team

A dedicated part of the Finance team that manages modern slavery initiatives to ensure compliance and broader Group awareness. The team works cross-functionally with Group Legal and relevant managers who interact with Jumbo's Supplier Protocol. The team consists of a 3 members, and the program is led by the Sustainability Lead.

Sustainability council

A cross-functional Council that provides feedback on the Sustainability Team's initiatives as it pertains to modern slavery.

Supplier assessment

This year, we introduced Sedex, an ethical data exchange platform, to enhance our supplier analysis. We primarily assessed modern slavery risk in our operations and supply chains during the reporting period using two methods, namely reviewing our top 50 suppliers by spend (**key suppliers**) across our Group and then utilising Sedex to identify 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. Our key suppliers account for approximately 91% of our total spend in FY25. For the 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 and the UK MSA.

Our key suppliers generally represent large, multinational technology, marketing and professional services businesses who 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.

Like previous years, in respect of some 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 a high-level risk assessment was conducted using Sedex. We have found suppliers identified as having medium risk of modern slavery, or potential second tier risk, within the following areas of supply:

- ✓ Office renovations;
- ✓ Postage and couriers;
- ✓ Technical employee outsourcing arrangements such as cleaning and consultants; 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, due to a majority of our key suppliers with an assessed low risk assessed by country and industry in Sedex.

Top 50 Key Suppliers Risk (assessed by country and industry)



Section 3

Taking action to address risks

Actions

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

1. Updated our compulsory modern slavery training through our online educational hub for all Group employees. This included the following information:

- ✓ Introduction to modern slavery concepts
- ✓ Modern slavery in the context of Australia, the UK and Canada
- ✓ Why modern slavery occurs
- ✓ Types of modern slavery
- ✓ Who is responsible for addressing modern slavery
- ✓ How this is relevant to Jumbo
- ✓ How employees can assist

2. Collected information on modern slavery in our supply chain through our established supplier engagement process. This includes asking whether the supplier has:

- ✓ Corruptions Perceptions Index score for where goods/services are supplied from
- ✓ Country sanctions
- ✓ Code of Conduct
- ✓ Modern Slavery Statement
- ✓ ESG Policy & Statement

3. Continued to monitor information collected on modern slavery in our supply chain through our established supplier engagement process. This is stored in a centralised hard drive that includes all completed supplier forms. The following supplier process is followed:



In 2025, 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 did not receive any whistleblower reports related to modern slavery or any other aspect of Jumbo's business.

If instances of modern slavery were reported in this financial year, Jumbo Group has in place grievance mechanisms to address this. Our Group Whistleblower Policy outlines the process taken to address grievances, and aims to encourage lawful, ethical and responsible behaviour in our business practices. Our updated confidential Group whistleblower service continues to provide access for individuals to report any concerns regarding Jumbo's exposure to modern slavery risk. This independent service, Speak Up, provides full access (24/7 365 days a year) worldwide and can be accessed by all employees via telephone, email, traditional mail and a secure online platform. These key policies and services underpin our remediation mechanism for reports related to modern slavery.

During the reporting period, we monitored our activities through the following means:

- ✓ Audit trails and reporting statistics on the implementation and completion of modern slavery risk training for relevant employees.
- ✓ Continuation of a supplier register and process which tracks new suppliers across the Group.
- ✓ Continuation 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 Finance and Legal teams.

Section 4

Assessing effectiveness

Jumbo is committed to continuous improvement in our identification, assessment and response to instances of modern slavery risks in our supply in accordance with relevant legislation and international standards. During the reporting period, we measured the effectiveness of our actions as outlined in the table below.

Area of modern slavery response	How Jumbo manages this	Activities in FY25	Effectiveness of actions taken	Priority activities in FY26
Identification of modern slavery risks	Identification of modern slavery risk factors listed in Section 3.	Monitored each supplier for adherence to risk factors.	100% of new suppliers assessed ¹ .	Update supplier process to incorporate Sedex for new suppliers and include additional screening factors.
Strengthening our grievance and remediation mechanisms	Group Whistleblower Policy and Confidential third-party hotline.	Updated our Group Whistleblower Policy and third-party confidential hotline.	Via employee acknowledgement of new policy and hotline.	Understand whether our current processes align with UN Guiding Principles on Business and Human Rights.
Educating our employees	Annual compulsory modern slavery training for all Group employees.	Updated training to include the latest information on modern slavery.	Via our online learning platform, Jumbo Uni.	Continue to encourage employee learning and update training with latest information.

1. In adherence with our Supplier Process.

Section 5

Consultation process

Internal Stakeholders

During the reporting period, we continued to engage with key stakeholders through our supplier process from our Legal, Finance, Operations and Engineering teams to understand the supply chains of their key suppliers. Our Sustainability Council met quarterly and were provided regulatory and internal updates by the Sustainability Lead on modern slavery. Board members were also regularly updated on modern slavery and enhancements to our supplier process, including the approval and integration of Sedex.

External Stakeholders

We released our FY25 Sustainability Report to external stakeholders, outlining information on our modern slavery training, processes and risk. We also met with investors to better understand their requirements regarding our disclosures. We continue to welcome further feedback to enhance our reporting.

Approval

For the purposes of the Australian MSA and UK MSA, this statement was approved by the Board of Jumbo on 28 November 2025 and is signed by Mike Veverka, Managing Director, CEO and Founder of Jumbo Interactive.



Mike Veverka

Managing Director, CEO and Founder

Appendix 1

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

Company directory

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Jumbo Group Sustainability

If you have any feedback regarding this publication, please contact sustainability@jumbointeractive.com.