

Tabcorp

# SUPPLIER CODE OF CONDUCT



# ALL FOR ONE

**Excitement with integrity is at the heart of everything we do. We balance that winning ticket, first-past-the-post, jackpot-hitting feeling with unwavering integrity.**

**That means embedding safeguards in all that we do and engaging in collaborative, supportive partnerships, across our industry and in our communities.**

We're committed to ethical, sustainable and socially responsible procurement. Our suppliers are our business partners, and we care about the way they do business.

The Supplier Code of Conduct represents our commitment to do the right thing, including respecting the rights of others. It ensures that we are collaborating with partners that make fair, responsible, and ethical decisions.

## TABCORP VALUES



### Do The Right Thing

We always act with integrity, standing up (and speaking out) for what's right.



### Explore What's Possible

We listen. We think big. We ask 'what if?' Our curiosity for what's next will shape tomorrow.



### Create Awesome Moments

We create excitement and positive experiences. Everything we do has the power to delight.



### Do It As One Team

We are stronger together. We are inclusive, collaborative and know that amazing ideas can come from anywhere.



### Make A Difference

We're passionate and proud about making a real change for customers, and benefiting our communities.

# WHO DOES THIS CODE APPLY TO?

This Code applies to Tabcorp's suppliers. Suppliers means any person, entity or organisation that supplies goods or services to Tabcorp and includes their own supply chain. Where the Code refers to supplier's workers, this includes employees, contractors, agency and temporary staff of the supplier and its own supply chain.

## PRINCIPLES

We expect our suppliers to align to the following six principles:

**INTEGRITY,  
ETHICS &  
CONDUCT**

**CORPORATE  
GOVERNANCE**

**LABOUR &  
HUMAN RIGHTS**

**HEALTH,  
SAFETY &  
WELLBEING**

**PRIVACY  
& CYBER  
SECURITY**

**ENVIRONMENTAL  
MANAGEMENT**

### Working Together

At Tabcorp we are committed to working collaboratively with our suppliers to meet, comply and exceed expectations we have set out in this Code. We seek to work with suppliers who operate under principles that are similar to this Code. This includes making a contractual commitment where it is feasible to comply with the applicable laws and work in line with our Code. We may require suppliers to provide evidence of their compliance with this Code and we may conduct independent audits of compliance. We expect all our suppliers, contractors and their employees to act in a way that is consistent with our Code and follow its principles. We will consider terminating contracts where we believe they have not met our standards or their contractual obligations.

### Record Keeping And Documentation

Suppliers must maintain appropriate management systems and documentation to demonstrate compliance regarding their business activities, labour, health and safety, environmental and ethical practices in accordance with applicable laws. Disclosure of information to Tabcorp and any regulatory or government bodies must be undertaken honestly and in good faith.

# INTEGRITY, ETHICS AND CONDUCT

We expect high standards of ethical conduct from our suppliers through their business activities, including in their relationships, governance, work practices, sourcing, and operations. This includes making decisions that are aligned to Tabcorp's and the supplier's corporate values.

## Business Integrity

Suppliers must comply with all anti-bribery, anti-corruption, anti-money laundering, labour hire licensing and human rights laws (including modern slavery legislation, where applicable). Suppliers must not engage in, either directly or indirectly, fraudulent, corrupt, intentionally misleading, exploitative or collusive activities.

## Professional Conduct And Confidentiality

Suppliers are expected to conduct themselves in a manner that is fair, professional and that will not bring Tabcorp or its partners, officers or employees into disrepute. Suppliers must not improperly use any private, confidential or commercially sensitive information in their possession relating to or in connection with their dealings with Tabcorp.

## Conflicts Of Interest

Suppliers must declare to Tabcorp any situation that raises an actual, potential or perceived conflict of interest related to, or in connection with, its dealings with Tabcorp. Suppliers must avoid financial, business or other relationships which may compromise the integrity or performance of their business commitments with Tabcorp. Any conflicts of interest that cannot be avoided are expected to be declared and managed appropriately.

## Animal Welfare

Tabcorp expects the highest standards of animal welfare and integrity and has zero tolerance to animal cruelty.



# CORPORATE GOVERNANCE

Suppliers must comply with all laws and regulations pertaining to their operations in connection with products and services they provide to us. This also extends to their own supply chain.

Suppliers are expected to maintain sound risk management, risk and compliance systems.

## Risk Assessment And Management

Suppliers are expected to develop and maintain a process to identify, manage and control relevant risks associated with their operations. These include supply chain risks and risks relating to critical incident management and business continuity, labour and human rights, health and safety, the environment, business ethics and corporate governance.

## Exchanging Gifts And Entertainment

Gifts and entertainment that are for business purposes and are not material or frequent are acceptable. Exchanging gifts and sharing entertainment in connection with a legitimate business purpose can foster constructive relationships with suppliers. However, gifts and entertainment should never affect, or appear to affect, impartial decision-making by Tabcorp employees. They should never be offered or received in exchange for preferential treatment in any business dealing.

Certain gifts and entertainment can erode others' trust in Tabcorp and must be avoided. These include any gifts or entertainment that appear to be bribes, raise questions about conflicts of interest for you or Tabcorp, or would damage Tabcorp's reputation.

## Anti-Bribery, Corruption And Whistleblower Protections

Suppliers are expected to implement procedures to ensure their employees comply with applicable anti-bribery and corruption laws. This includes effective controls to confirm gifts, hospitality and entertainment are not being used to attempt to improperly influence a business decision or outcome.

Suppliers are expected to have whistleblowers policy and/or grievance process that is clearly communicated and understood by the supplier's employees, protecting and prohibiting retaliation or victimisation against whistleblowers.

# LABOUR AND HUMAN RIGHTS

Our people are one of our greatest strengths. We value diversity of people and thought. All workers in our supply chain deserve to be treated with dignity and respect. Suppliers are expected to provide a fair and ethical workplace, which upholds human rights and integrates appropriate labour and human rights policies and practices into its business operations.

## Prevention Of Involuntary And Underage Labour

We are committed to the elimination of all forms of forced and compulsory labour, and to the effective abolition of child labour.

Suppliers must:

- ensure that all work is undertaken without coercion
- not use any form of forced, bonded or indentured labour
- not use child labour and employ only workers who are of the applicable minimum legal age, and
- ensure that company products, services or facilities are not used for human trafficking and/or labour or sexual exploitation.

All use of temporary and outsourced labour must comply with applicable laws.

Suppliers are expected to use all reasonable endeavours to ensure that any third-party recruitment agencies they use are compliant with the provisions of this Code and applicable laws.

## Working Hours, Wages And Benefits

Suppliers must:

- comply with all applicable laws and regulations with respect to wages, working hours, leave, superannuation and workers compensation insurance
- strive to pay all employees a living wage, and on the principle of equal pay for equal work
- ensure work performed is based on a lawfully recognised employment or services relationship, and
- always obtain and maintain a labour hire licence where required by law and provide Tabcorp with evidence of this.



## Anti-Discrimination

Our suppliers must not discriminate against any worker based on age, disability, ethnicity, gender, marital status, political affiliation, race, religion, sexual orientation, gender identity, union membership, or any other status protected by law, including in hiring and other employment practices.

## Anti-Harassment

Everyone is entitled to fair treatment, courtesy, and respect.

Tabcorp will not tolerate any form of abuse or harassment of employees, contractors, suppliers, customers, or anyone else we deal with. Suppliers are expected to commit to a workplace free from workplace bullying, harassment, victimisation, and abuse. Suppliers must not bully workers or threaten workers with, or subject them to, unlawful or inhumane treatment, including abuse or harassment which is verbal, physical, sexual, or psychological.

Using abusive or inappropriate language during business activities, performance conversations and reviews is prohibited.

## Inclusion & Diversity

Tabcorp embraces, and is committed to, inclusion and diversity in its operations and through its supply chain. Tabcorp seeks to respect and value the differences that exist in the workforce and make reasonable adjustments for workers, where required, to ensure people can be their true selves at work. Diversity covers all aspect of differences, such as gender, ethnicity, marital or family status, religion, culture, language, sexual orientation, gender identity, disability and age, as well as differences in background and life experience.

We expect our suppliers to be committed to providing equal employment opportunities and to treating people with dignity and respect. This includes a commitment to diversity and inclusion in all forms.

## Human Rights

At Tabcorp, we believe that human rights are universal and fundamental rights that preserve the inherent freedom, dignity and equality of all human beings. As such, our suppliers are expected to provide goods and services in a manner consistent with any applicable human rights obligations. This includes:

- complying with federal human rights laws, such as the **Modern Slavery Act 2018 (Cth)**
- complying with international human rights laws and norms set out in the **International Bill of Human Rights** and the **International Labour Organisation Declaration on Fundamental Principles and Rights at Work**, and
- managing their own operations and supply chain in line with the **United Nations Guiding Principles on Business and Human Rights**.

## Freedom Of Association And Collective Bargaining

Suppliers must allow freedom of association for workers to join or form trade unions or industrial organisations of their own choosing and to bargain collectively, or engage in any lawful industrial activity without interference, discrimination, retaliation or harassment.





## Health, Safety And Wellbeing

Tabcorp is committed to providing a safe environment for its employees, contractors and visitors, and actively promotes health, safety and wellbeing in the workplace. Our suppliers are also expected to provide a safe and healthy work environment for all workers including appropriate training to ensure they're able to perform their jobs safely. Suppliers are expected to integrate sound health and safety management practices into their business and ensure compliance with applicable laws. Suppliers, their supply chain and subcontractors must comply with all of our applicable health and safety policies and procedures when entering Tabcorp properties or sites.

## Privacy And Cyber Security

We take privacy seriously at Tabcorp. The security of our information and digital systems is essential to our success. We expect our suppliers to protect Tabcorp technology systems, data, networks, and information relating to our customers. Suppliers are expected to implement policies, technical solutions, operations and security measures that meet or exceed the commitments we make in our privacy policy and ensure compliance with all relevant

legislation, standards and regulations, including the Australian Privacy Principles, as well as any specific privacy or data security obligations suppliers owe to us contractually. All risks to, or actual or suspected breaches of, information security or privacy obligations must be reported to us immediately.

## Environmental Management

We are committed to reducing our environmental impact through our operations and business activities by reducing waste, emissions and discharges, and using energy efficiently.

Suppliers are expected to comply with all relevant local and national environmental protection laws, regulations and standards as well as strive to comply with international environmental protection standards. Our suppliers should actively manage the environmental impact of their operations and take responsibility for minimising the impact of their products and services throughout their lifecycle. We expect our suppliers to have an Environmental Management System or appropriate plan in place to identify and manage environmental risks such as energy use, water use, waste and greenhouse gas emissions.



# WHEN YOU NEED EXTRA HELP

You can find out more here:

**CODE OF CONDUCT**

**ANTI-BRIBERY AND CORRUPTION POLICY**

**WHISTLEBLOWER POLICY**

**INCLUSION & DIVERSITY POLICY**

**PRIVACY POLICY**

**TABCORP HUMAN RIGHTS POLICY**

**ENVIRONMENT AND CLIMATE CHANGE POSITION STATEMENT**

If you have any queries or concerns regarding the issues raised in this document, please contact the Procurement Tabcorp team on [corporateprocurement@tabcorp.com.au](mailto:corporateprocurement@tabcorp.com.au)