

# Sanctions Policy



## Purpose

At The Lottery Corporation, we're committed to complying with the law and ensuring the highest standards of honesty and integrity in all our activities. This includes compliance with Australian economic and trade sanctions requirements, as well as any other sanctions obligations that might apply to The Lottery Corporation. We expect our people to do the right thing and comply with applicable laws, codes and policies.

The purpose of this policy is to inform you of The Lottery Corporation's sanctions management principles and your obligations and expected conduct to ensure we manage and comply with sanctions laws.

## Who this policy applies to

This policy and related procedures apply to everyone who works at The Lottery Corporation, including all directors, employees and contractors (**team members**).

## What are sanctions?

Government and international organisations use sanctions as a tool to seek to influence or change the behaviour of a country or regime. This may be used in cases where, for example, that country or regime is violating human rights, waging war or endangering international peace and security.

Sanctions work by imposing a ban or restriction, including on finances and/or trade for a specific country, vessel, person or entity. The scope of sanctions varies by country and by situation.

All people and companies in Australia must comply with the sanctions laws imposed in Australia. Companies may also be required to comply with sanctions laws of other countries depending on the location and nature of their operations.

The main types of sanctions likely to be relevant to The Lottery Corporation's operations are financial sanctions, which prohibit dealing with the funds or economic resources of a designated person or entity.

## The Lottery Corporation's sanctions risk management principles

At The Lottery Corporation, we:

- take a risk-based approach to managing compliance with our sanctions obligations;
- will not conduct activities that are in breach of applicable sanctions laws; and
- ensure appropriately skilled team members are undertaking and supervising sanctions-related processes.

## Your obligations

To comply with this policy, you must:

- complete training related to sanctions, if you are requested to do so;
- perform your duties honestly and comply with all policies and processes that help ensure The Lottery Corporation's compliance with applicable sanctions laws, such as in procurement and customer transactions. See our FAQs for more information about these;

Compliance with company policies is a condition of employment at The Lottery Corporation. The Lottery Corporation may vary its policies at its discretion from time to time, without prior notice or compensation to employees or contractors, and the content of this policy is not incorporated into any contract of employment or engagement. This policy is current at the date of printing.

Classification: Internal

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- not engage or do business with any individual or entity that has been flagged as sanctioned through screening protocols;
- escalate any potential sanctioned individual or entity identified through screening protocols by email to the Chief Legal and Risk Officer's team, without notifying the person/entity; and
- not provide to any person any advice on how we might conduct business to avoid sanctions restrictions, or give other advice about sanctions obligations or otherwise be involved in assisting or promoting avoidance.

If you're unsure about whether something could breach sanctions laws, you must seek advice by email to the Chief Legal and Risk Officer's team before proceeding. If in doubt, ask.

## How to raise a concern

We encourage and expect you to report any actual or suspected breach of this policy. If you have any concerns that another team member may be acting inconsistent with this policy or engaging in unlawful conduct, you should take one or more of the following actions:

- immediately notify a member of the Chief Legal and Risk Officer's team and/or the General Manager Risk & Compliance; and/or
- make a report to The Lottery Corporation's whistleblower service. Reports to this service may be made anonymously. See The Lottery Corporation Whistleblower policy for more information on how to make a whistleblower report.

## What happens if you breach this policy

It's your responsibility to understand and comply with this policy. The Lottery Corporation treats non-compliance seriously and resulting action could include suspension or termination of employment or engagement with The Lottery Corporation.

If you break any laws, you may also be personally subject to criminal legal action leading to imprisonment and/or significant financial penalties. The law of other jurisdictions may also apply.

## Policy control

<b>Current from</b>	Adopted by the Board on 3 March 2022 to take effect upon the company's admission to the Official List of ASX
<b>Replaces version dated</b>	N/A
<b>Review period</b>	Annual
<b>Sponsor</b>	Chief Risk and Legal Officer
<b>Approved by</b>	Board