

Code of Conduct





Message From Our CEO

The Lottery Corporation has a long and proud history of creating positive impacts for our partners, stakeholders, customers, communities and our people.

Our reach is far and wide, and with that comes a responsibility to do the right thing.

Our people are the driving force behind our success and growth, and we're committed to a high standard of corporate conduct, integrity, ethics and governance. It's not just about the work we do, but how we do it that matters.

I'm proud to be part of a high-performing team that sets benchmarks and leads change. This pride stems from our collective efforts to positively impact our industry and community, ensuring a legacy for future generations.

Our Code of Conduct describes how we work at The Lottery Corporation and sets expected standards of behaviour consistent with our purpose, strategy and principles, particularly being accountable and transparent. It provides clear guidance for making responsible decisions and addressing issues when they arise.

Please take the time to read and understand this Code. It will help you to make good decisions, and speak up if you see something that you think isn't right.

You all have an important role to play, and I thank you for your dedication to making The Lottery Corporation a place where trust, respect and collaboration are at the heart of everything we do. Together, we will continue to build a responsible and sustainable company we can all be proud of.

Sue van der Merwe
Managing Director and CEO
The Lottery Corporation

Our Vision, Purpose and Principles

Our vision is to be the world's best lottery operator

We already have many of the things needed to be the world's best. We have a strong business with well-known brands. We hold key licences and are trusted by governments and stakeholders. Importantly, we have a strong reputation in Australia and internationally.

Our purpose is to create positive impacts

We create positive impacts every day, through prizes paid to winners, commissions paid to small businesses, taxes and duties paid to state, territory and federal governments, and contributions to charitable and community partners. Our purpose drives us to enhance our positive impact, for customers, shareholders, community and our people.

The principles that matter most to us, are that together we:



Create joyful moments



Dare to find a better way



Are accountable and transparent



Nurture the uniqueness of our people

Our principles

Our principles are universal, don't change over time and are independent of personal beliefs. Together with our vision and purpose, these principles guide our work, priorities and importantly our behaviours.

Introduction to The Lottery Corporation Code

What the Code is for

The Code sets out the standards of conduct and behaviour that we expect of our leaders and team members who work within, or are contracted to, The Lottery Corporation. We have a clear vision for the future, with an ethical compass to guide us. Our Code gives us a framework to be a great place to work, a trustworthy company to interact with and invest in, and a solid corporate citizen for the community.

How we use it

Our Code provides a baseline for how we conduct ourselves and empowers us to make better decisions. Our Code is clear on conduct and behaviour standards and enables accountability. Our Code will evolve with us as we grow and it will be reviewed regularly to make sure it's effective and reflective of who we are, and what's important to us.

Who it applies to

Our Code applies to The Lottery Corporation and its related companies, and everyone working for and with our business, including our employees, senior executives, directors, officers and contractors. Our Code applies to you when you're representing The Lottery Corporation at anything work related. Whether that's during work hours or not.



What we expect from you

We expect you to act in line with our principles and be accountable for your actions. This means you should:

- Be aware, diligent and comply with all laws, rules and regulations.
- Be ethical and responsible in how you act.
- Conduct yourself with a sense of accountability and have ownership of your decisions.
- Act with integrity and honesty in your decisions and interactions.
- Strive to do no harm to our team members, investors, the public or to The Lottery Corporation and its shareholders.
- Act in the best interests of The Lottery Corporation at all times.
- Treat others with fairness, equity and respect.
- Call out poor behaviour or wrongful actions when you see it, stand for up for what's right and speak up when needed.
- Bring your best self to work and focus on making a positive impact on your teammates, customers and the community.



What you can expect from The Lottery Corporation

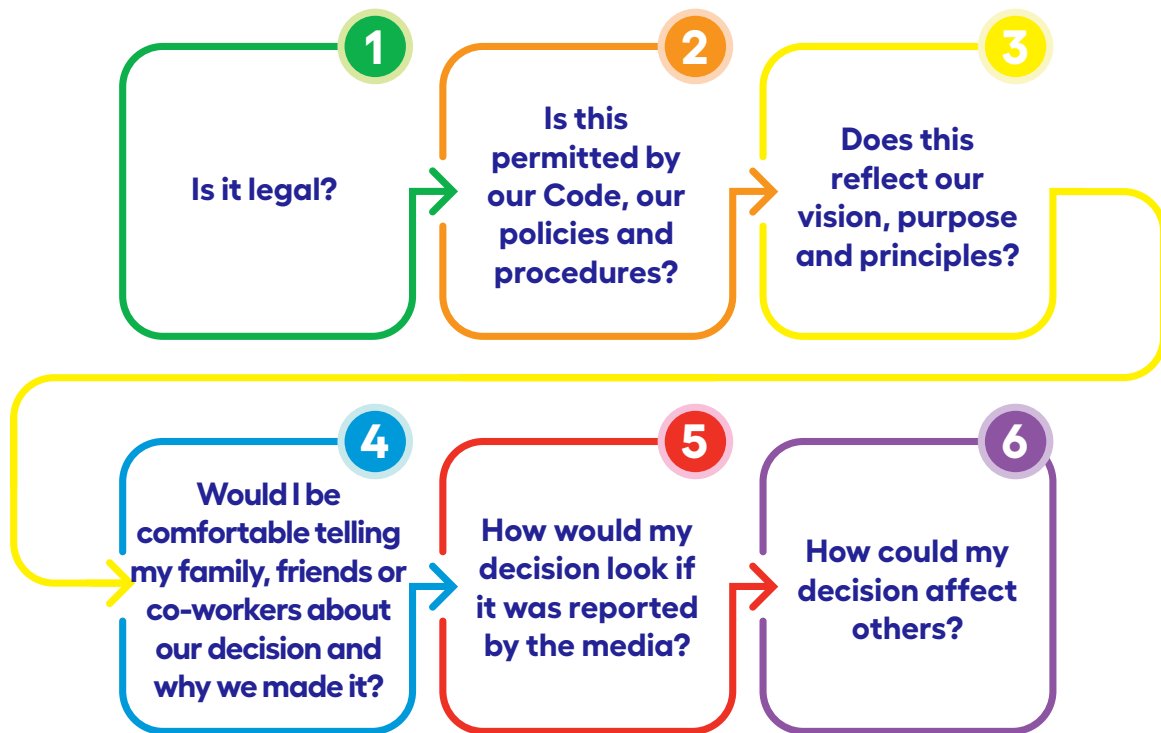
We are committed to being the best in business and this means we care for our team members and act responsibly. We do this by:

- Valuing everyone's health, safety and wellbeing.
- Being committed to continually and proactively improving the way we work.
- Supporting you when you stand up for the right thing.
- Offering work environments that are diverse, inclusive and flexible.
- Empowering you to communicate clearly and honestly, and to act with integrity.
- Ensuring you feel safe to report if you see or hear something that is not in line with our policies or Code.
- Giving you the autonomy and agency to make good decisions and supporting you to do so.
- Promoting ethical and compliant business practices through our policies and meeting legal and regulatory obligations.

Making Decisions in Line with our Code

Sometimes, you are faced with choices at work, and it's hard to know which path is the right one to take. You might know or have a sense of what the right thing to do is, but you need a way to convince others or to get help to get it done.

In those moments, you should also stop and ask the following questions of yourself and of others:



If you're faced with a tough decision or a test of your integrity and you're unsure what to do, you can always ask your People Leader or People Experience.

If you have concerns...

Tell us. If you witness, or are subjected to, poor behaviour of any kind, or you see something that doesn't sit right with you, please let us know. Say something. We're counting on you to help us improve. If you need support or are unsure whether someone else's actions breach the Code, you can use the methods outlined in the Workplace Behaviours Policy or Whistleblower Policy.

These policies outline the ways you can address various issues using The Lottery Corporation systems available to you, and details the contacts you can speak to if you need help or guidance, or if you're unclear about what you should do.

What happens if I breach the Code?

If you breach the Code, depending on the circumstances and severity of the breach, there can be serious consequences. This can include disciplinary action of different kinds; the most serious being termination of your employment or engagement.



Legal Responsibilities

Avoiding Conflicts and Protecting Trust

Dishonesty, bribery and corruption are not just against the law—they go against everything we stand for. These actions undermine trust, damage reputations and devalue our efforts. We have worked hard to build trust with our customers, shareholders and the community and don't want anything to jeopardise this.

Personal conflicts, and perceived conflicts, can arise in all sorts of different ways across the course of your work at The Lottery Corporation. Prioritising personal interests or obligations to others over your duties to The Lottery Corporation and the interests of our business, customers, partners, and shareholders must be avoided.

Conflicts can arise in the context of various relationships and interactions, so think carefully and broadly when approaching anything that might be a conflict and seek help and guidance to ensure these are avoided. You should avoid giving or receiving gifts or benefits in a manner that could lead to actual or perceived personal conflicts.

We do the right thing by our shareholders and the market. We also care about our customers, regulators and the communities who may be impacted by our decisions. We have obligations to comply with the law and make disclosures about some of our activities and concerns. We always strive to do what is right, even when the law doesn't provide clear guidance on the path we should take. We stand for transparency, accountability and honesty always.

We have a range of company standards in place to guide us and make sure we're acting ethically, and staying compliant:

- Anti-Bribery, Corruption and Fraud Policy
- Personal Conflicts Policy
- Sanctions Policy
- Market Disclosure Policy
- Securities Trading Policy
- Political Contributions Policy
- Modern Slavery Statement

These policies are housed on our [Corporate Governance](#) page. They provide the information you need to meet your responsibilities confidently and consistently.



Safety, Respect & Inclusion

Everybody deserves to be treated with equal respect and dignity at work. You have the right to a safe working environment, where you are welcomed and your uniqueness is celebrated. At The Lottery Corporation, we value diversity and inclusion, and see it as a critically important driver for how we behave.

Several policies outline how you are expected to conduct yourself at work, including:

Workplace Behaviour Policy

Health Safety & Wellbeing Policy

Inclusion & Diversity Policy

TLC Assets & Security, Privacy & Confidentiality

Protecting The Lottery Corporation's assets, information and reputation is essential. This includes not disclosing confidential information, whether intentionally or accidentally, and handling personal information collected on behalf of The Lottery Corporation with care. Additionally, it involves being careful with property and tools provided for doing your job, including The Lottery Corporation's intellectual property (IP).

Before dealing with any information, consider the potential consequences and how you would want your own personal information to be treated – it's a great start. Also be certain that your use of any of The Lottery Corporation's IP is permitted and won't damage or devalue it.

The Information Management Policy and Personal Information Handling Policy outline your responsibilities for the proper handling of The Lottery Corporation's data and assets (including personal information).

Policies Relevant to the Operation of the Code

Workplace Behaviour Policy

Personal Conflicts Policy

Anti-Bribery, Corruption and Fraud Policy

Sanctions Policy

Market Disclosure Policy

Securities Trading Policy

Inclusion & Diversity Policy

Whistleblower Policy

Political Contributions Policy

Health Safety & Wellbeing Policy

Personal Information Handling Policy

Information Management Policy

