

Political Contributions Policy



Purpose

The Lottery Corporation Limited (**The Lottery Corporation** or **Company**) is committed to acting with integrity and adhering to the highest ethical standards, including strict compliance with laws applicable to political donations in Australia and overseas. This policy sets out the principles and laws that inform The Lottery Corporation's approach to political contributions and donations and should be read in conjunction with our Anti-Bribery and Anti-Corruption Policy.

Who this policy applies to

This policy applies to everyone who works at The Lottery Corporation including all directors, officers, employees, contractors and consultants of any The Lottery Corporation Group company (**team members**).

This policy does not prevent The Lottery Corporation employees from making political donations in their personal capacity, except as required by local laws. Refer to the Political Contributions Guidelines for further information.

What constitutes a political contribution?

A political contribution includes a gift, a gift in kind, or payment made to or for the benefit of a political cause. For example, contributions made to any of the following individuals or groups, used wholly or in part to fund political campaign expenditure:

- a political party or associated entity;
- an elected member of Parliament or of a local council;
- a candidate or group of candidates;
- a third-party campaigner; or
- an employee of a local council or government department.

Examples of political contributions include:

- a direct or indirect donation of money;
- a contribution, entry fee or other payment to participate in a fundraising event or function where it is primarily a political fundraiser and payment forms part of the proceeds of the event;
- a subscription paid to a political party for membership or affiliation;
- the provision of a service at no charge, or at a discounted rate; or
- non-cash payments such as gifts or prizes for a political fundraiser or purchasing items at a political fundraiser.

Corporate hospitality offered in the ordinary course of The Lottery Corporation's business is not considered a political donation, as it doesn't constitute a gift to be used wholly or in part to fund political campaign expenditure. Refer to the Political Contribution Guidelines for further information.

Principles for policy contributions

As an ASX listed company operating in a highly regulated environment – with significant tax obligations to governments and a major contributor of funding to retail partners – The Lottery Corporation has a responsibility to its shareholders and stakeholders to participate in the process of public policy development.

From time to time The Lottery Corporation holds memberships with various networking forums organised by political parties and The Lottery Corporation personnel attend networking events that support political parties as they participate in the democratic system of parliamentary government in Australia – at both a

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Commonwealth and state/territory level. Under various Australian laws the cost of these networking forums and events is classified as a 'political donation' and is sometimes required to be publicly disclosed.

The Lottery Corporation takes a strict principles-based approach to making political contributions. These principles are:

- strict compliance with all laws in Australia and overseas;
- an honest and transparent approach at all times;
- no 'cash-only donations' are to be made to any political party or affiliate;
- a bi-partisan approach to political contributions must be taken as much as is practicable; and
- all contributions must have a public policy focus with the aim of creating value for customers, partners, the community and shareholders.

Public policy priorities which The Lottery Corporation advocates for include:

- sustainable lotteries sectors across Australia;
- strong responsible gambling and consumer protection laws; and
- strategic priorities to create value for The Lottery Corporation customers, partners, the community and shareholders.

Who can make political contributions on behalf of The Lottery Corporation?

Team members are strictly prohibited from making political contributions on behalf of The Lottery Corporation, except as set out in this policy.

As part of the annual budget process, The Lottery Corporation Board approves the annual political engagement program, which includes memberships of networking programs and events for the coming year. An additional 10% of the program funding will be incorporated into the budget as a contingency for activities not foreseen during the budget process.

The following team members are authorised to approve political donations within the contingency:

- the MD & CEO, up to a value of \$11,000;
- the Chief Commercial Operations Officer, up to a value of \$5,500; and
- the General Manager – Corporate Affairs, up to a value of \$1,100.

Monitoring and reporting

The Board has oversight of The Lottery Corporation's Political Contributions Policy and approves an annual political engagement program each year as part of the annual budget process. An update on activities and payments made under the program will be reported at each Board meeting.

In the interests of transparency, The Lottery Corporation discloses all political contributions made under the annual political engagement program to the Australian Electoral Commission (AEC) and other bodies as required by law, irrespective of whether such contributions are classified by law as a 'political donation' or required to be disclosed.

[A link to The Lottery Corporation's most recent AEC annual disclosure report will also be available from The Lottery Corporation website.](#) The Lottery Corporation also publishes information about its political contributions program in its Annual Report and Corporate Governance Statement, which are available on The Lottery Corporation website.

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This policy and applicable laws governing political donations will be reviewed annually, with recommended changes provided to the Board for review.

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. Breaches may also expose The Lottery Corporation to a potential criminal liability for a bribery offence which, along with substantial financial penalties, can cause significant reputational damage. Furthermore, breaches by an individual may also lead to criminal and civil liability, which could result in up to 10 years' imprisonment and/or significant financial penalties.

For more information

For more information in relation to this policy, please contact the General Manager – Corporate Affairs.

Policy control

Current from	Adopted by the Board on 30 August 2024
Replaces version dated	3 March 2022
Review period	Annual
Sponsor	Chief Commercial Operations Officer
Approved by	Board