



## **MODERN SLAVERY ACT STATEMENT**

of IGT (Australia) Pty Limited and its subsidiary International Game Technology (NZ) Limited, hereafter “IGT”.

### **INTRODUCTION**

This is the first year IGT is publishing its Modern Slavery Statement in accordance with the Modern Slavery Act 2018 (**‘the Act’**). The Act sets out Australia’s legislative framework for preventing modern slavery in large organisations and their supply chains. This statement discloses the processes that are in place at IGT to ensure that modern slavery is not taking place in any of its supply chains nor in any part of its business.

### **ZERO TOLERANCE**

“Modern slavery” is a crime and a violation of fundamental human rights. It takes various forms including slavery, servitude, forced and compulsory labour, as well as human trafficking, all of which have in common the deprivation of a person’s liberty by another in order to exploit them for personal or commercial gain.

IGT has a zero-tolerance approach to modern slavery. IGT is committed to acting ethically and with integrity in all of its business dealings and relationships and to implementing and enforcing effective systems and controls to reduce the risk of modern slavery from occurring in its businesses and in those of its suppliers.

Through its zero-tolerance approach to modern slavery IGT remains dedicated to working toward the goal of eliminating any possible breaches of human rights through its supply chain.

### **STRUCTURE & OPERATIONS**

International Game Technology Plc (09127533) (**“IGT PLC”**) is a public limited company incorporated in England and Wales with its ordinary share capital listed on the New York Stock Exchange. IGT PLC and its subsidiaries (the



“**Company**”) had combined revenues of \$4,785,806 USD (\$ thousands) for the year ended 31 December 2019. Through its group companies, IGT PLC provides the government-sponsored and commercial gaming industry with solutions for gaming, lottery and interactive products. The Company is a global organisation operating in a complex and highly regulated business environment with 11,922 employees across the globe. The Company is committed to responsible gaming, giving back to the communities in which it operates, protecting the environment, and preventing and mitigating risks of human rights violations related to its global operations.

IGT (Australia) Pty Limited (ACN 002 904 690) is a proprietary limited company incorporated in Australia with 287 employees, registered office: Level 5, Building B, 11 Talavera Road, Macquarie Park, New South Wales, 2113, Australia. IGT (Australia) Pty Limited’s line of business includes the manufacture and supply of machines, systems and related parts to gaming venues in Australia and New Zealand. IGT (Australia) Pty Limited is a wholly owned subsidiary of International Game Technology (C7491-1980) (“**International Game Technology**”) which is a corporation incorporated in Las Vegas, Nevada, United States. In turn, International Game Technology is a wholly owned subsidiary of IGT PLC (the “Company”).

In addition, IGT (Australia) Pty Limited wholly owns International Game Technology (NZ) Limited (381296) (NZBN: 9429039488442), a registered New Zealand limited company, registered office: Bell Gully, Level 21, 171 Featherston Street, Wellington, 6011, New Zealand. The company derives revenue from the sale of gaming machines, systems and related parts and has 1 employee.

## **SUPPLY CHAIN**

IGT’s supply chain is both direct and indirect. Its direct supply chain is associated with materials purchased through suppliers to use in its own product manufacturing. IGT’s manufacturing process follows the procedures of the International Organisation for Standardization (a non-governmental global organization that define international standards and specifications for products, services and systems, to ensure quality, safety and efficiency). The indirect supply chain consists of purchases of third-party off-the-shelf products that are generally manufactured for the general public, not specifically for IGT. These



products are used for IGT's customer solutions as well as for internal business infrastructure.

## **IGT PROCESS**

During the reporting period, IGT took steps to develop a comprehensive understanding of its supply chain in the context of modern slavery with a view to identifying ways in which IGT can prevent and reduce the risks of modern slavery.

## **ASSESSING AND ADDRESSING RISKS OF MODERN SLAVERY**

In line with IGT's core values of acting with integrity in every aspect of its business, IGT strives to implement effective processes to eradicate modern slavery, if any, from its business and supply chains. As such, detailed below are key measures that IGT undertook in the 2019 reporting period to address the risks of modern slavery in its operations and supply chains.

### **IGT CODE OF CONDUCT**

Each year IGT informs its employees about the IGT Code of Conduct which specifically references modern slavery. The IGT Code of Conduct, available at <http://www.igt.com/explore-igt/about-igt/compliance>, sets out the standards of ethics and behaviour expected from its employees, directors, officers, and consultants, as well as any third parties, agents, or representatives who deal with or act on behalf of IGT. The IGT Code of Conduct specifically references modern slavery at page 31, which requires supervisors to ensure that employees have freely chosen their jobs and are free to leave if they choose. In addition, supervisors are advised to watch out for signs of slavery, including by IGT's business partners. Supervisors are warned that slavery may happen several steps down the supply chain, such as when a supplier switches to a lower-cost vendor.

Any violation of the IGT Code of Conduct can be reported to the IGT Integrity Line which is managed by an independent provider. The Integrity Line is a confidential way for IGT employees, contractors and third parties to anonymously report activities that may involve unethical or unlawful conduct via telephone or the online portal, contact details of which can be found at <https://www.igt.com/explore-igt/about-igt/compliance>. The IGT Integrity Line



provides a mechanism for concerns of modern slavery to be raised and subsequently investigated.

IGT is bound by the “Anti-Retaliation Commitment” contained within the Code of Conduct. This means that IGT will not discipline, discriminate, or retaliate against anyone who makes a good faith report or inquiry via the IGT Integrity Line and will respect the confidentiality of such individuals. IGT is also committed to taking corrective action for breaches of the Code of Conduct up to and including termination of employment for individuals deemed accountable.

### **SUPPLIER CODE OF CONDUCT**

IGT has a global Supplier Code of Conduct (the “**Supplier Code**”) which outlines IGT’s expectations regarding the workplace standards and business practices of IGT’s Suppliers, along with their parent entities, subsidiaries, affiliates, subcontractors, and others who are within their supply chain. IGT raises awareness of the Supplier Code by making it publicly available in the “Global Responsibility” section of IGT’s publicly accessible website, which can be accessed at <https://www.igt.com/explore-igt/about-igt/global-responsibility/our-corporate-citizenship>. In addition, the Company has sent the Supplier Code to approximately 800 of IGT’s existing suppliers and it forms an integral part of the on-boarding package for new suppliers.

In the Supplier Code of Conduct, IGT provides that Suppliers are restricted from (i) participating in or benefitting from any form of forced labour, and (ii) impairing employee rights, including data protection rights. Suppliers are also required to inform IGT of any potential violation of the Supplier Code. And in the event of a violation, the concerned supplier shall commit to a remediation plan.

### **EVALUATION**

IGT has conducted an analysis of the products procured through its supply chain as well as the suppliers representing approximately 80% of its total annual expenditure for the year ended 31 December 2019 in order to identify and prioritise areas of business risk for the next reporting period.



IGT operates and provides an integrated portfolio of innovative gaming technology products and services, including: lottery management services, online and instant lottery systems, gaming systems, instant ticket printing, electronic gaming machines, sports betting, digital gaming, and commercial services.

As a result, IGT manufactures and contracts for manufacture land-based machine products (including, but not limited to, slot machines, video poker machines, video lottery terminals, electronic or video bingo machines, lottery terminals, instant ticket vending machines, and ticket scanners). It is worth noting that hardware purchased for installation with the Company systems technology products is not manufactured or contracted for manufacture by IGT and as such will fall outside of the analysis which will follow.

International Game Technology manufactures and contracts for manufacture land-based machines (and component parts) for its subsidiaries around the world and IGT's analysis confirmed that more than 80% of IGT's direct purchases in 2019 were intercompany purchases from International Game Technology.

The type of products that International Game Technology purchased in 2019 are set forth below:

- Electronics – Printed circuit boards and similar items which control computing and the function of peripheral devices.
- LCD (liquid crystal displays) assemblies.
- Mechanical – metal or plastic component parts.
- Bill acceptor - This includes bill validators (which includes a scanner), bill accumulator, and housings
- Integrated Assembly – A partial assembly and or gaming cabinet build with specific mechanical and electronic assemblies included-

- Electrical – parts such as wire, power supply and other similar or electrical component that do not control computing.
- Scanner – device used to electronically identify monetary bills and or tickets.

(together, the “**Products**”)

IGT’s analysis revealed that 80% of the Products purchased by International Game Technology in 2019 were manufactured in the following countries: South Korea, Taiwan, Mexico, Japan, China, USA and the United Kingdom.

IGT has identified a potential risk that it may be linked to modern slavery through its supply chain as one or more of the conflict minerals tantalum, tin, tungsten and gold are included in most of IGT’s land-based machine products (including, but not limited to, slot machines, video poker machines, video lottery terminals, electronic or video bingo machines, lottery terminals, instant ticket vending machines, and ticket scanners) (the “**Covered Products**”).

To address this risk, in IGT PLC’s “Conflict Minerals Report” for the year ended 31 December 2019 IGT PLC surveyed 43 suppliers either supplying materials for the Covered Products or supplying materials containing conflict minerals and received responses from suppliers accounting for approximately 95% of the aggregate amount spent in 2019 on direct material purchases. IGT PLC traced back the origin of any conflict minerals by identifying smelters, refineries or recyclers and scrap supplier sources. IGT PLC’s analysis of the smelter documentation provided by suppliers revealed that, with three exceptions, the conflict minerals supplied to them did not originate from any smelters located in any of the covered countries (defined as the Democratic Republic of Congo and adjoining countries).

Moreover, IGT continues to strengthen its approach in managing the risk of modern slavery within its operations and supply chains by adapting to ever-changing working practices. For instance, IGT is monitoring modern slavery risks related to its global operations in light of the coronavirus (COVID-19) pandemic and believes that sufficient measures are in place to mitigate any increased risks arising.



To further this aim, IGT has established a cross-functional Sustainable Procurement working group to regularly review the effectiveness of IGT's response to modern slavery with a view to implementing further measures to reduce risk in IGT's next Modern Slavery Statement.

## **CONSULTATION WITH SUBSIDIARY ENTITY**

This statement is made jointly by IGT (Australia) Pty Limited and International Game Technology (NZ) Limited. As International Game Technology (NZ) Limited is not a reporting entity under the Modern Slavery Act 2018, the Sustainable Procurement Team approved the statement on this entity's behalf.

*This statement was reviewed and approved by the board of directors of IGT (Australia) Pty Limited on 30 September 2020*

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