

Sanctions Policy



Purpose

At The Lottery Corporation, we expect our people to do the right thing and comply with applicable laws, codes and policies. This includes compliance with Australian sanctions laws, which impose economic and trade restrictions on certain countries and/or on residents of those countries.

The purpose of this policy is to set out The Lottery Corporation's principles for managing sanctions and your obligations and expected conduct to manage and comply with Australian 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.

What are sanctions?

Sanctions are a tool designed 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 engaging in malicious cyber activity, violating human rights, waging war or endangering international peace and security.

The most common sanctions measures are restrictions on trade in goods and services, restrictions on engaging in commercial activities and targeted financial sanctions (including asset freezes) on sanctioned persons and entities.

All people and bodies corporate in Australia must comply with Australian sanctions laws. Australian sanctions laws apply to activities in Australia and to activities undertaken overseas by Australian citizens and Australian-registered bodies corporate.

The sanctions likely to be relevant to The Lottery Corporation's operations are financial sanctions, which prohibit making an asset (including money) available to or dealing with an asset of a sanctioned person or entity.

How we approach Sanctions risk

TLC's approach to managing sanctions risk is consistent with the Autonomous Sanctions Act 2011 (Cth) (the Autonomous Act) and the Australian Autonomous Sanctions Regulations 2011 (Cth).

At The Lottery Corporation, team members must:

- complete training related to sanctions, where required to do so;
- perform their duties honestly and comply with all policies and processes applicable to sanctions laws, such as procurement and customer transactions;
- 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 [Risk and Compliance 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.

Refer to the [Sanctions FAQs](#) for more information on your obligations.

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If you are unsure about whether something could breach sanctions laws, you must seek advice by email to the [Risk and Compliance 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 inconsistently with this policy or engaging in unlawful conduct, you should take one or more of the following actions:

- immediately notify a member of the Risk and Compliance team or the General Manager Risk & Compliance; and/or
- make a report via The Lottery Corporation's whistleblower service (known as Speak Up) at www.speakupthelotterycorporation@deloitte.com.au. Reports to this service may be made anonymously. See the Whistleblower Policy for more information.

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

Version Control

Current from	22 June 2023
Review period	Annual
Sponsor	Chief Legal & Risk Officer
Approver	The Lottery Corporation Board

Change History

Amendment Number	Approved by	Date	Description of changes
1	Board	23 May 2022	Creation of TLC Sanctions Policy, effective on 1 June 2022 for the demerger.
2	Board	21 June 2023	Annual refresh of the policy – minor amendments to the context and formatting.

Document Hierarchy

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

Sanctions Policy



Overarching Policies	Risk Management Policy Compliance Management Policy
Related Policies	Procurement Policy Whistleblower Policy Human Rights Policy
Related Protocols	Modern Slavery Statement Code of Conduct
Related Processes & FAQs	Sanctions FAQs