

## **Forced Labour and Child Labour in Supply Chains Report - 2024**

**LNW Gaming Canada Ltd.**

**2025 May 29**

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### **Introduction**

- 1 This report is submitted by LNW Gaming Canada Ltd., part of the Light & Wonder, Inc., group of companies ("Light & Wonder", "We", "Our".)
- 2 Light & Wonder is committed to addressing all forms of potential harms including "Forced Labour" and "Child Labour" as defined in the Fighting Against Forced Labour and Child Labour in Supply Chains Act (the "Act") – herein referred to as "modern slavery".
- 3 Light & Wonder is committed to ensuring there is transparency in our businesses and in our approaches to tackling modern slavery throughout our supply chains.
- 4 This report, which is intended to meet the requirements of the Act, describes:
  - (a) Light & Wonder's structure, operations, and supply chain; and
  - (b) the steps taken by Light & Wonder and its controlled entities, during the financial year ending 2024 December 31 to minimize the risk of modern slavery practices occurring within our operations and supply chains.

### **Business overview and commitment**

Light & Wonder is committed to maintaining a resilient and responsible supply chain that secures the mutual success and wellbeing of all parties. In 2024, we took great strides to enhance due diligence and geographic diversification as part of our ongoing risk mitigation program. Our procurement spend is evenly split between material suppliers providing parts and products for our machines, and suppliers of services such as information technology, marketing and human resources.

Through our Supplier Code of Conduct and master services agreements, we strive to ensure all our suppliers understand our requirements in areas including labour, human rights, the environment and health and safety. Our Global Procurement Policy and procedures oblige everyone responsible for overseeing the commercial relationships between Light & Wonder and its suppliers to ensure that all aspects of our relationships are held to the highest ethical and professional standards. In 2023, we surveyed our top 20 direct material vendors as the first stage of a new program to improve our visibility of potential corporate social responsibility risks in our supply chain.

With the support of third-party auditors and our internal audit team, we have completed on-site audits of most of our critical vendors in the USA, Europe and Asia in 2024 and we haven't identified any major non-compliance.

Light & Wonder is unwavering in its zero-tolerance approach to modern slavery and human trafficking in its operations and supply chain. This is detailed in our Code of Business Conduct, Supplier Code of Conduct, UK Modern Slavery Act statements which we file annually in the UK in compliance with the UK Modern Slavery Act 2015, our Australian Modern Slavery Statements in compliance with the Australian Modern Slavery Act 2018 and this report in compliance with the Act.

### **Our structure**

- 5 Light & Wonder is a public company dually listed on the Australian ASX and USA's NASDAQ with its principal place of business at:  
  
6601 Bermuda Road  
Las Vegas, NV, 89119  
United States of America
- 6 LNW Gaming Canada Ltd. is a company limited by shares, incorporated and domiciled in Canada. LNW Gaming Canada Ltd. is wholly owned indirectly by Light & Wonder. Its registered office and principal place of business is:  
  
LNW Gaming Canada Ltd  
44 Chipman Hill, Suite 1000  
Saint John, New Brunswick  
E2L 2A9 Canada
- 7 Light & Wonder and the entities it controls form a group (the “**Group**”) for consolidated accounting and tax purposes.
- 8 LNW Gaming Canada Ltd. is wholly owned by LNW Gaming, Inc. LNW Gaming, Inc. is wholly owned by Light & Wonder, Inc.
- 9 Neither Light & Wonder nor LNW Gaming Canada Ltd. own or control any other Canadian entity considered a reporting entity under the Act.

### **Our operations**

- 10 As of 2024 December 31, the Group employed approximately 6,500 employees.
- 11 Light & Wonder manufactures, distributes and supplies electronic gaming machines, systems and related parts to authorized gaming venues globally and supplies game software to licensed online casinos and creates and distributes software for the social gaming (no wagering) environment.
- 12 More information detailing the range of activities carried out by Light & Wonder, Inc. and its subsidiaries is available at: <https://www.lnw.com/about>.
- 13 Light & Wonder and its subsidiaries have the following core global functions:  
  
(a) Sales and Marketing;

- (b) Manufacturing and Distributing;
  - (c) Software and Platforms Research and Development;
  - (d) Game Development;
  - (e) Online real money gaming and online social gaming (no wagering);
  - (f) Business Services and Information Technology;
  - (g) Finance;
  - (h) Legal; and
  - (i) Regulatory Compliance.
- 14 All of the above functions report to the Light & Wonder Chief Executive Officer, who in turn reports to the Board of Directors.
- 15 For more information on Light & Wonder's structure, business, operations and financial performance please go to the "Investor" section of Light & Wonder's website at <https://explore.investors.lnw.com/financials/annual-reports/default.aspx> and access a copy of our Annual Report.

#### **Our supply chains**

- 16 Externally purchased materials, services and equipment represent a dominant share of Light & Wonder's supply chains.
- 17 Light & Wonder's supply chains are both direct and indirect.
- 18 The direct supply chain is associated with:
- (a) materials purchased through suppliers, including other affiliates of Light & Wonder to use in its own product manufacturing such as casino chip sorting machines and card shuffling devices manufactured under license; and
  - (b) developers of game concepts and related software.
- 19 The indirect supply chain consists of purchases of third-party off the-shelf products that are generally manufactured for the industry, not specifically for Light & Wonder and specific contracted supply of gaming equipment and cabinets such as the gaming console, operating systems, currency note stackers, related computer peripherals and displays. These products are used for the manufacturing of Light & Wonder products as well as for internal business infrastructure. Indirect supply chain also encompasses services required by Light & Wonder.
- 20 Major suppliers are located in the USA, Asia Pacific (Taiwan, South Korea, Vietnam, China), Europe (Austria), Canada and Mexico.

## **Modern slavery risk assessment, management and training**

### **Modern slavery risk assessment**

- 21 Light & Wonder has undertaken risk analysis of its operations and supply chains to identify modern slavery risks.
- 22 During the assessment, we identified areas with the lowest risks of modern slavery practices, such as local operations handled by staff directly employed by Light & Wonder in significant numbers in Australia, Canada, China, France, Greece, India, Israel, Malta, Mexico, New Zealand, Spain, South Africa, United Kingdom and the United States, and subject to contemporary human resources practices.
- 23 The risk assessment also identified certain suppliers, which contributed to approximately 90% of the Group's purchasing activity, as being suppliers, whose parts, components, or materials might give rise to modern slavery risks and where those parts, components or materials may contribute to our operations.
- 24 The risk assessment also identified modern slavery risks based on geographical location. In particular, in labour employed by contracted entities operating throughout the world and raw material risks associated with the technology used within our products are notable areas of modern slavery risks.

### **Modern slavery risk management and training**

- 25 Light & Wonder has in place a compliance program, that is endorsed by the Light & Wonder Board of Directors and overseen by the Chief Compliance Officer, which mandates that due diligence investigations are undertaken of every new supplier and ongoing monitoring is conducted for existing suppliers.
- 26 During the reporting year, we collected information on new suppliers prior to any engagement and conducted an analysis of risk factors to evaluate the extent of due diligence required.
- 27 Those risk factors include the nature of the business relationship, the dollar value in terms of cost/revenue, and the location of the business, including if it operates in a high-risk jurisdiction.
- 28 Based on the risk analysis, due diligence can involve public database searches, litigation, industry source, regulatory, credit, law enforcement, and Embassy checks. Third-party consultants, sales agents and vendors who externally represent Light & Wonder, as well as joint venture, distributor, and fee sharing relationships, are subject to more vigorous due diligence than a one-time supplier who is merely providing a product.
- 29 Light & Wonder is committed to doing business ethically and responsibly and has in place a Code of Business Conduct which outlines the requirement that conduct and behaviours must be in compliance with applicable governmental laws, rules and regulations. Anyone conducting business for Light & Wonder, and its subsidiaries, including employees, officers, directors and consultants, to the extent required in their consulting agreement, and suppliers, to the extent required in their supply agreement, is expected to read, understand and adhere to

this Code, and comply with all applicable policies and procedures. Light & Wonder also has an Ethics Line (Independent Whistleblower hotline) available for reports of breaches.

- 30 Light & Wonder has in place Master Service Agreements with all our top vendors which sets out a prohibition on forced labour and human slavery. This includes clauses on freely chosen employment, young workers, working hours, wages and benefits, humane treatment, non-discrimination and freedom of association.
- 31 During the reporting year, Light & Wonder conducted supplier surveys which included questions on modern slavery practices, the Conflict Minerals Declaration under EU law (which encourages the responsible sourcing of minerals), conducted site visits of key suppliers to review performance and expectations of their supply operations and conducted a Corporate Social Responsibility survey of the Group's top 20 vendors.
- 32 All employees are required to complete onboarding and annual ethics and compliance training, with modules on our Code of Business Conduct and other policies.
- 33 We annually review our policies and training content to ensure that they continue to be up to date.

**Member of the Company's dedicated management team conduct quarterly internal reviews associated with supply chain risks - assessing our effectiveness in combating modern slavery**

- 34 Light & Wonder monitors the effectiveness of the processes and procedures to address the modern slavery risks that our business causes, contributes to, or is directly linked to, in line with the UN Guiding Principles on Business and Human Rights.
- 35 We continually and regularly assess the effectiveness of our actions in identifying and managing modern slavery risks by tracking our actions and outcomes, partnering with suppliers and other external partners, and undertaking regular internal governance and external assurance processes.
- 36 Based on the results of these processes we will adapt and strengthen our actions to continually improve our response to modern slavery.
- 37 During this reporting period we did not become aware of any instances of modern slavery in our supply chain or operations and, therefore, no measures have been taken to remediate any forced or child labour or to remediate any loss of income. We continue to be mindful and aware of any additional modern slavery key risks within our supply chain for future reporting periods.

### **Approval and Attestation**

This report was approved by Siobhan Lane, sole Director, President, Treasurer and Secretary of LNW Gaming Canada Ltd. on 2025 May 29, in accordance with subparagraph 11(4)(a) of the Act for the year ending 2024 December 31.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have the authority to bind LNW Gaming Canada Ltd, that I have reviewed the information contained in the report and that the information is true, accurate and complete in all material respects.



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Siobhan Lane  
Director, President, Treasurer and Secretary  
LNW Gaming Canada Ltd.  
Date: 2025 May 29