

MODERN SLAVERY

Statement 2023



INTRODUCTION

Flutter Entertainment plc Modern Slavery Statement 2023

Flutter Entertainment is a global sports betting and gaming operator with a portfolio of leading international brands and operations. We believe in bringing entertainment to life for our customers in a safe, responsible and sustainable way. Our purpose is to deliver a vibrant and safe sports betting and gaming experience to our customers around the world. Our operations range from sports bookmaking to gaming, with exchanges, poker, fantasy sports and B2B in between.

Our commitment to preventing modern slavery

At Flutter, we recognise that modern slavery is a global threat that imposes an unbearable burden on those affected by it and it is imperative that we take every possible measure to alleviate the suffering caused. It is incumbent on all organisations to ensure that their operations remain free from this invidious practice. We are committed to conducting our relationships to the highest ethical and moral standards and we pledge to act with integrity and professionalism in all our activities.



Scope and coverage of this statement

This statement has been published in accordance with the Modern Slavery Act 2015 (the "Act"). It sets out the steps taken by Flutter Entertainment plc and our subsidiaries during the year ended 31 December 2023 to prevent modern slavery and human trafficking in our business and supply chains. This is our fifth statement.

This statement has been approved and adopted by the Board of Flutter Entertainment plc, as well as each of the Group's subsidiaries that meet this requirement under the Act.*

As part of our commitment to improving our performance by sharing best practice across our businesses' we assess, monitor and mitigate risks relating to slavery and human trafficking on a Group-wide basis, with individual divisions and operating companies taking specific actions where appropriate to the level of risk. In line with this, our statement also applies to all our businesses which are not legally required to make a statement under the Act, regardless of their location, size or turnover.

Approved and signed on behalf of the Board of Flutter Entertainment plc



Peter Jackson
Group Chief Executive Officer

* UK registered entities: Betfair Limited, Bonne Terre Limited, Tombola Limited, Hestview Limited, Fanduel Limited and Power Leisure Bookmakers Ltd.

OVERVIEW

of our structure, operations and supply chain in 2023

Flutter Entertainment plc is headquartered in Dublin and employs more than 20,000 people globally. We have organised our business into four divisions whose activities and brands are summarised below:

UK&I

Our sports betting and gaming brands are among the most popular in the UK&I market. Sky Betting & Gaming, Paddy Power and Tombola offer market leading innovation to millions of customers every week.

Although the brands mostly operate online, this division also includes 600+ Paddy Power retail shops in the UK and Ireland.

Australia

The Sportsbet brand is the market leader in online sports betting across Australia. Its innovative, easy to use products and outstanding personalised value combine to create a leading customer proposition.

International

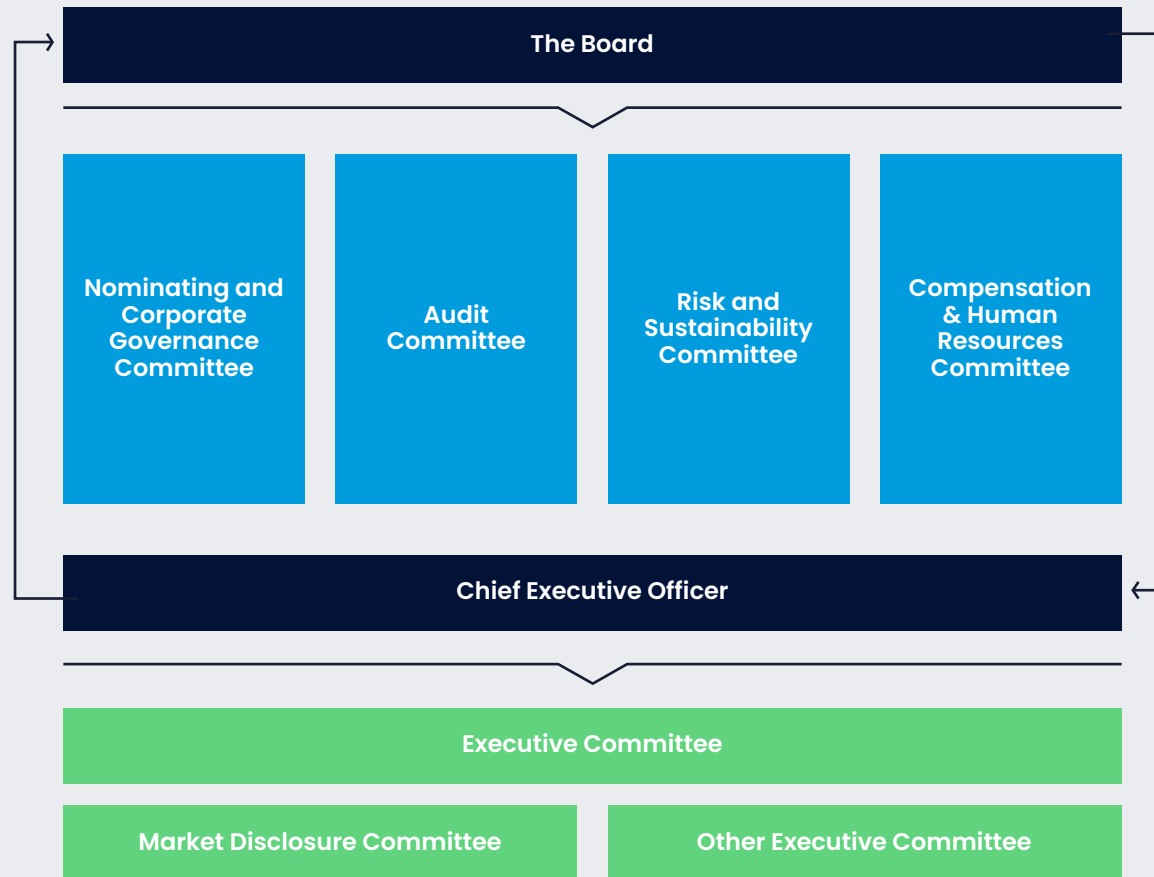
Flutter International operates in over 100 countries around the world including in Italy with the largest online operator, Sisal, and globally with PokerStars, the world's largest online poker site. The division also includes Betfair International, Adjarabet and Jungle Games.

US

Our US division consists of FanDuel, TVG and PokerStars. The division has a diverse set of online and retail sportsbooks, iGaming, fantasy sports, poker, online racing wagering and TV broadcasting products. FanDuel is the market leading online sportsbook and casino operator in the rapidly expanding US market.

Across our operations, Flutter has a high proportion of colleagues performing highly skilled roles. The majority of our employees are based at offices in Ireland, the UK, the Isle of Man, Malta, Australia, the US, Romania, Portugal, Italy, India, Bulgaria and Georgia. The remainder of our colleagues are based in our retail shops and kiosks in the UK, Ireland, Georgia and the US.

GOVERNANCE



The Board has overall governance responsibility for Flutter together with its subsidiaries. The Board is the decision-making body for all matters of such importance as to be of significance for Flutter and the Group as a whole because of their strategic, financial or reputational impact. The Risk and Sustainability Committee oversees and monitors the material risks and opportunities facing the Company and oversees the implementation and execution of the Company's objectives and strategy in respect of ESG, including climate change and safer gambling.

Flutter has a dedicated Legal & Compliance team, a Group Director of Property and Procurement and a Group Head of Environmental and Sustainable Supply who supports our Procurement team.



POLICES

We invest significant time to put in place the appropriate processes, policies and governance structures that guide us in everything we do. We expect suppliers to make all reasonable efforts to conduct business in a way that respects human rights as set out in the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Human Rights and Business, and the International Labour Organisation Core Conventions and Declaration on Fundamental Principles and Rights at Work.

Flutter recognises that modern slavery in all its forms is a complex problem with no single root cause which requires a holistic range of preventative measures. There are a number of key codes and policies, approved by Flutter leadership that demonstrate our commitment. These include:

1

Code of Ethics

Our Code of Ethics clearly states our commitment to ensure that we operate in a way that respects, protects and champions the human rights of all those who come into contact with our operations.

The Code of Ethics contains specific provision in relation to identifying and reporting any risk or suspected incidence of modern slavery within the Group's operations. Our Code was updated during the year and is available [here](#).

2

Whistleblowing Policy

Our Whistleblowing Policy outlines our commitment to support employees and contractors who wish to voice any concerns they may have without fear of retaliation. Our policy is available [here](#).

3

Anti-Bribery and Corruption Policy

Our Anti-Bribery and Corruption Policy outlines our zero-tolerance approach to bribery and corruption and outlines our expectations of our employees, customers, business partners and third parties or associated persons acting on our behalf to reduce the risk of bribery and [corruption across our business](#).

4

Global Procurement Policy and Supplier Risk and Performance Management ("SPRM") Policy

Our Global Procurement Policy and Supplier Risk and Performance Management ("SPRM") Policy requires that, in assessing the suitability of a supplier or partner partnership, staff are directed to have specific regard to any risk of modern slavery posed by the new or prospective supplier.

The purpose of the policy is to ensure that supplier risk and performance is appropriately evaluated, measured, managed and controlled to eliminate or mitigate the impact of risks.

5

Supplier Code of Conduct

Our Supplier Code of Conduct sets out our expectations around the behaviour of our suppliers in the areas of modern slavery, ethics and sustainable business concerning applicable laws, regulations and codes of practice of the countries and states in which they operate, or of any countries and states that they are subject to through their work for Flutter.

RISK ASSESSMENT AND DUE DILIGENCE

Flutter operates an entertainment business that is predominantly online based, with some retail presence and live events in countries. Most of our procurement spend is in skilled sectors with a similarly low-risk profile. We abide by all relevant domestic employment legislation in the countries where our staff are employed and ensure appropriate documentation is in place for these employees to work.

Whilst our employees work in skilled sectors which are not typically high risk from a modern slavery perspective, we have robust employee due diligence processes including background and verification checks to mitigate the risk of slavery and trafficking. New hires are subject to verification, including national ID/passport checks and right to work documentation, which mitigate the risk of employing persons connected with modern slavery and human trafficking.

We have made considerable progress in continuing to strengthen and develop our risk management processes and procedures during 2023, including the segmentation of our suppliers and categorising risk. Suppliers are subject to formal onboarding processes. We recognise that, with the size and scale of our business, there is a risk that some suppliers may have issues deeper within their own supply chain.

We will continue to extend the monitoring of our suppliers for non-compliance with our commitment to preventing modern slavery and we will be particularly vigilant in relation to suppliers in any higher-risk countries and sectors. We have identified suppliers as potentially having a moderate to higher inherent risk in our overall operations and supply chains, e.g. cleaning services and merchandise products, and appropriate criteria are in place with these for onboarding.

We are in the process of implementing a third-party assessment tool allowing suppliers to undertake assessments to evaluate how well they have integrated the principles of sustainability and corporate social responsibility, including modern slavery, into their business operating model and management systems. Some of our suppliers are already utilising this platform and will be encouraged to share their scorecards with us.



OUR SUPPLY CHAIN

Flutter's supply chain is large, encompassing thousands of suppliers globally with an annual procurement spend of £5bn. Most of our supply chain spend is in skilled sectors such as professional services, marketing and information technology. The main countries of origin for our key suppliers are the UK, Ireland, the US and Australia.

Our supply chain covers the following main goods and services:

- **content services** for streaming capability, pricing updates and data feeds from local racing and sporting bodies;
- **marketing** for our various brands across the world including advertising and merchandising (e.g. T-shirts);
- **technology** for our software, hardware development and support requirements; and
- **consulting/contractors** to support activities including tech and professional support services.

To date, thousands of entities and individuals in Flutter's supply chain have been screened for risks associated with modern slavery. We continued to focus efforts on extending the tools we employ to screen our suppliers more effectively for risk or exposure to instances of forced labour and human trafficking. We monitor our suppliers more broadly across the business, commensurate with their risk profile.

The screening is not just performed on supplier entities but can be extended to directors and beneficial owners. This allows us to screen new and existing suppliers more effectively against a range of harmful activities, including the risk of modern slavery within their operations. If a Flutter supplier is found to exhibit a risk of such practices in its operations, we expect them to work in conjunction with us to develop and implement a corrective action plan that details actions and a timeframe to address the issue found. If a Flutter supplier is unwilling to engage with us or where such engagement does not reasonably meet Flutter expectations, we reserve the right to terminate the relationship.

In 2023, there was one instance whereby a prospective supplier screened was flagged for modern slavery. This demonstrates our screening process is working. Flutter is committed to continuing to screen for such practices and will continue to be proactive in monitoring our business for breaches.



TRAINING AND REPORTING

A modern slavery training module was developed and rolled out in December 2022. All new joiners must complete the module. This training was developed to increase employee awareness of the potential of modern slavery risks occurring and outlines steps to be taken to report any concerns.

Additionally, all HR staff are appropriately trained in the relevant procedures applicable to the risk of modern slavery in the recruitment process. HR processes are in place to manage any risk in the recruitment process and escalate accordingly.

SPEAK UP PROCESS

We are committed to conducting business honestly, fairly and in accordance with the law. As part of this commitment, we provide a confidential way to report concerns through our Speak Up platform. This platform is hosted by a third party, is available 24/7 and allows for anonymous reporting of any serious concerns including modern slavery. We are committed to protecting and facilitating those who report concerns in good faith and in the public interest. We investigate all reports and take appropriate action as necessary.



OUR FUTURE COMMITMENTS

- To review and update our Modern Slavery Statement every year in line with our commitment to ensuring that our business and supply chain remain free from any association with breaches of the Act.
- To roll out targeted modern slavery training for our Procurement team.
- To refresh our Supplier Code of Conduct as appropriate, reinforcing awareness and expectations around the behaviour of our suppliers, in combating modern slavery, promoting ethics and sustainability and abiding by applicable laws, regulations and codes of practice in the countries they operate in (or are subject to) as part of Flutter's supply chain.
- To continue to develop our policies and processes to ensure our approach remains commensurate with our risk profile.
- To monitor changes in our business and in the environments in which we operate to capture and manage any new or evolving risks so that our zero-tolerance approach to modern slavery is maintained.



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