



MODERN SLAVERY STATEMENT

Flutter Entertainment plc 2025



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This statement has been published in accordance with Section 54 of the Modern Slavery Act 2015 (the “Act”). It sets out the steps taken by Flutter Entertainment plc (“Flutter”) and our subsidiaries to prevent modern slavery and human trafficking in our business and supply chains during the year ended December 31, 2025.

This statement has been approved and adopted by the Risk & Sustainability Committee of the Board of Directors of Flutter Entertainment plc, as well as each of the Group’s subsidiaries that meet this requirement under the Act (as set out below).

Flutter is a global sports betting and iGaming 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 iGaming experience to our customers around the world. Our operations range from sports bookmaking to gaming, with exchanges, poker, fantasy sports, and B2B in between.

UK registered entities

- Betfair Limited
- Bonne Terre Limited
- Tombola Limited
- Hestview Limited
- TSE Development Limited
- Power Leisure Bookmakers Limited
- FanDuel Limited

Our commitment to preventing modern slavery

At Flutter, we bring together a portfolio of world-class brands, global scale and challenger mindset, through which we excite and entertain our sector. We use our collective power, the Flutter Edge, to create a better future for our customers, colleagues, and communities. All of our work is underpinned by sustainability through our Positive Impact Plan through which we strive for positive change for our customers, colleagues, communities, and the environment.



Flutter recognizes our role to respect the human rights of all workers within our own operations, value chains, and the communities in which we operate. We are committed to respecting and upholding the principles embodied in the United Nations Guiding Principles on Business and Human Rights, the Universal Declaration of Human Rights, and the International Labour Organisation’s Declaration on Fundamental Principles and Rights at Work. This statement sets out our approach to identifying, remediating, preventing, and assessing modern slavery risks.

Signed by

Peter Jackson
Group Chief Executive Officer

Queries relating to this statement should be addressed to:
complianceenquiries@flutter.com

Our business structure

Flutter Entertainment plc is a public limited company incorporated and domiciled under the laws of Ireland, with operational headquarters in New York. The Group has its primary listing on the New York Stock Exchange and a secondary listing on the London Stock Exchange.

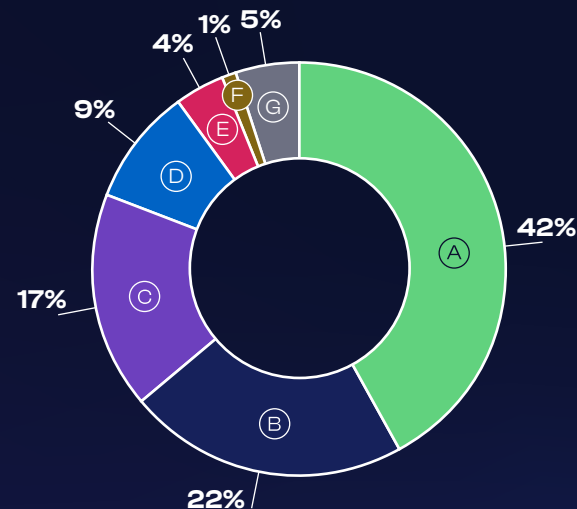
Flutter employs more than 28,500 people globally, with a majority of employees based at offices in Ireland, the UK, Malta, Australia, the US, Romania, Portugal, Italy, India, Serbia, Albania, Bulgaria, Georgia, and Brazil. The remainder of our colleagues are based in our retail shops and kiosks in the UK, Ireland, Georgia, the US, Italy, and Serbia.

Across the UK and Ireland, we have five offices and 506 Paddy Power betting shops. 485 of the betting shops are in England and the Republic of Ireland and 21 are in Scotland, Wales and Northern Ireland.

28,500+

people employed globally by Flutter.

Revenue by geography %
Year ended December 31, 2025



- A US
- B UK & Ireland
- C Southern Europe & Africa
- D Asia Pacific
- E Central & Eastern Europe
- F Brazil
- G Other

Our brands



[For more information](#) about our business, including our divisions and brands, please visit our website

Our supply chain

14,000+

suppliers encompassed by Flutter's supply chain globally.

\$6 billion

approximate annual procurement spend.

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 & Sustainability Committee (the "RSC") oversees and monitors the material risks and opportunities facing Flutter and oversees the implementation and execution of Flutter's objectives and strategy in respect of ESG, which includes modern slavery. The RSC oversees Flutter's compliance with legal and regulatory requirements in conjunction with the Audit Committee of the Board of Directors (the "Audit Committee") and provide review and oversight of issues related to the key technology risks facing Flutter.

Flutter's Legal, Risk, Compliance, Sustainability and Procurement teams work together to devise, implement and monitor policies, systems, and processes to support and guide our business in identifying, mitigating, and remediating modern slavery risks. Where potential issues are observed, they are discussed in a cross-functional supplier governance forum.



[Read more](#) about our Corporate Governance here



Policies

We invest significant time and resources in establishing robust processes, policies, and governance structures that underpin our approach to responsible business conduct. We conduct and expect our suppliers to make all reasonable efforts to conduct business in a manner consistent with internationally recognized human rights standards, including but not limited to the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Business and Human Rights, and the International Labour Organisation Core Conventions and Declaration on Fundamental Principles and Rights at Work.

Flutter recognizes that modern slavery, in all its forms, is a complex and multifaceted issue that requires a coordinated and preventative approach. We review or update a number of key codes and policies annually, as appropriate. They were approved by Flutter leadership, and demonstrate our commitment to addressing these risks. Our codes and policies are shown opposite.

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.

2 Whistleblower Policy

Our Whistleblower Policy outlines our commitment to employees, contractors, and suppliers who wish to voice any concerns they may have without fear of retaliation.

3 Global Procurement and Partnerships Policy

Our Global Procurement and Partnerships Policy requires that our business engages with suppliers in a legal and ethical manner that prioritizes sustainability. This includes a strong commitment to identifying, understanding, and mitigating the risks of modern slavery throughout the lifecycle of our relationship with a supplier, from selection through to termination.

4 Supplier Code of Conduct

Our Supplier Code of Conduct sets out our expectations around the behavior of our suppliers, including direct suppliers as well as subcontractors, agents, recruitment agencies, and external consultants. It makes significant reference to modern slavery, including but not limited to child labor, and forced and bonded labor and gives suppliers information on what to do if modern slavery is found or suspected.

5 Anti-Bribery and Corruption Policy

Our Anti-Bribery and Corruption Policy and sets our zero tolerance approach to Bribery and Corruption and supports our commitments outlined above.

[Read more](#) on our Code of Ethics

[Read more](#) on our Whistleblower Policy

[Read more](#) on our Supplier Code

[Read more](#) on our Anti-Bribery and Corruption Policy

Risk assessment and due diligence

We adopt a risk-based approach to identifying and addressing modern slavery risks within both our own operations and our supply chain.

Our own employees

We comply with all applicable domestic employment legislation in the jurisdictions where our employees are based and ensure appropriate documentation is maintained to confirm legal working status. While our workforce predominantly operates within skilled and regulated sectors, which present a lower inherent risk of modern slavery, we recognize the importance of maintaining robust recruitment and onboarding controls. Our employee due diligence processes include background and identity verification checks, including confirmation of right-to-work documentation. These measures are designed to reduce the risk of modern slavery and human trafficking occurring within our recruitment and employment practices.

Our supply chain

Flutter's supply chain comprises over 14,000 suppliers globally, with annual procurement spend of approximately \$6bn. Our global spend is predominantly within skilled and

professional sectors that are not traditionally high risk for modern slavery. These include technology, marketing, gambling content services, payment services, and consulting. However, while these sectors present a lower inherent risk profile, we recognize that the risk of modern slavery occurring is still present, and therefore, we continually monitor for modern slavery risks.

In alignment with our risk-based approach, we have identified certain services sourced externally that are in higher risk industries. Among these are cleaning and facilities management, apparel sourcing for marketing and technology hardware that may rely heavily on temporary, transient or migrant labor. The majority of our global spend is with suppliers in countries that are classified as being low risk for modern slavery, such as USA, United Kingdom, Ireland, Italy, Australia and Canada. Where we do have suppliers located in higher risk countries, the bulk of our spend with them is in lower risk sectors as above. Across many of our brands, suppliers are subject to screening which includes ESG considerations, including human rights and modern slavery. Where gaps or areas for improvement are identified, we expect the supplier to work in conjunction with us to develop and implement a corrective action

plan that details actions and a timeframe to address issues identified. 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 reconsider or terminate the relationship.

In the reporting period, there were no instances of modern slavery flagged from our screening and Flutter is committed to continuing to screen for such practices and be proactive in monitoring our business for breaches.

Over the last 18 months, we have strengthened our risk management processes to improve our screening and visibility of sustainability risks, such as modern slavery, across our supply base. Our updated approach includes:

- enhanced risk-mapping across supplier categories, geographies, and spend;
- deeper integration of sustainability criteria (including human rights and modern slavery) in the management of critical suppliers; and
- use of third-party data sources and expertise to identify adverse media or exposure to labor-rights risks.

In addition, we have applied a new supplier sustainability maturity assessment to our critical suppliers. This seeks to assess suppliers

more broadly for sustainability risks, covering environment, social (including labor and human rights, and ethics), and governance. This helps us gain a more holistic view of our suppliers' approach to sustainability, gauge current alignment with our Positive Impact Plan, and determine the level of ongoing monitoring and engagement they receive.

We continue to refine our risk management approach as our systems and processes evolve. We are working to strengthen our identification, assessment, and mitigation of modern slavery risk further. In 2026, we have started implementing new technology that incorporates sustainability criteria such as modern slavery and human rights more extensively into supplier onboarding and management. Suppliers identified as operating in higher-risk sectors will be subjected to additional due diligence, including completion of a targeted modern slavery questionnaire. Through this, we will check whether suppliers have policies, controls, and risk mitigation activities related to labor, and human rights performance, including risks relating to child labor, forced labor and human trafficking. We will also have more consistent data capture, monitoring, and reporting across our global operations, with enhancement of key performance indicators.

Employees

Speak up process

We are committed to conducting business honestly, fairly and in accordance with the law. As part of this commitment, we provide several channels for confidential reporting through our Speak Up platform. This platform hosted by an independent third party, is available 24/7, and allows for anonymous reporting of any serious concerns including those related to modern slavery. It can be used by our own employees, agency workers, supply chain workers, and any third parties working for, or on behalf of, Flutter.

We investigate all reports and take appropriate action as necessary. No instances of modern slavery were reported via our Speak Up Platform during the reporting period.

24/7

availability for anonymous reporting through our Speak Up platform.

Training and awareness

Modern slavery awareness forms part of our mandatory Code of Ethics training for employees. This training is designed to increase understanding of potential modern slavery risks and to reinforce available reporting channels. By embedding awareness of modern slavery within our mandatory training, we aim to support early identification and escalation of potential concerns.

Completion of mandatory training is monitored through our internal systems.

Code of Ethics

modern slavery awareness forms part of our mandatory Code of Ethics training.

Future commitments



Enhance our due diligence processes for high-risk suppliers, deepening engagement and remediation.

Broaden and refine our key performance indicators to provide a more comprehensive view of modern slavery risk across the supply chain.

Explore and evaluate cutting-edge intelligence solutions designed to enrich our existing supplier risk data.



 Queries relating to this statement should be addressed to: complianceenquiries@flutter.com



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