

SUPPLIER CODE OF CONDUCT 2024



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1 Company Introduction

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. Across the entire Flutter family, we're passionate about taking care of our customers, colleagues, communities, and the planet. Through combining our global scale and local know-how, we want to drive positive change in our sector through our Positive Impact Plan.

Our Positive Impact Plan focusses on four key pillars: **Play Well**, supporting our customers to have positive playing experiences; **Work Better**, creating an inclusive and empowering environment for our colleagues; **Do More**, supporting our global communities; and **Go Zero**, reaching net zero carbon and reducing our environmental impact. It is our blueprint to drive change for good.

We see our suppliers as key partners in helping us deliver on our Plan and we want to ensure we're engaging with suppliers that are committed to our principles and helping us achieve our goals.



POSITIVE IMPACT PLAN

2 Our Expectations

Flutter is committed to, conducting business with honesty and integrity, the protection of human rights and dignity, protection of the environment and supporting our communities.

We purchase goods and services from a large and varying number of suppliers. Our relationships with suppliers are based on fairness and transparency.

We expect our suppliers to abide by all applicable laws, regulations, and codes of practice of the countries and states in which they operate, or of any other countries and states that they are subject to through their work for Flutter or other customers. This expectation applies to all sections of this Code of conduct.

This supplier Code of Conduct (“Code”) is intended for all suppliers that are involved in Flutter’s supply chain, including both our direct and indirect suppliers, as well as subcontractors, agents, recruitment agencies and external consultants. We expect our suppliers to communicate this Code to all relevant parties in reference to our supply chain. We expect suppliers to advise us of any subcontractors that are engaged during the course of the relationship, in relation to the services provided to Flutter.

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, the International Labor Organisation Core Conventions and Declaration on Fundamental Principles and Rights at Work.

We expect our suppliers to read, acknowledge, and take all reasonable steps to adhere to this Code of Conduct to enter and maintain a business relationship with us.

If any non-conformance with the Code is identified, we expect our suppliers to develop and implement a corrective action plan that details actions and a timeframe to address any areas of concern.

Suppliers should immediately inform Flutter if a non-conformance of this Code is identified so we can mitigate any potential impact on our customers or employees as well as other businesses or individuals.

Flutter may conduct its own supplier monitoring, and may, from time to time, request reviews to be undertaken to confirm compliance with this Code. Suppliers may also be asked to undertake assessments through [EcoVadis](#). [EcoVadis](#) is a collaborative platform that allows companies to evaluate how well they have integrated the principles of sustainability and corporate social responsibility into their business operating model and management systems. Suppliers may be asked to fill in an assessment annually.



3 Business Ethics

3.1 Using Data and information responsibly

We expect suppliers to handle, process, store and dispose of information provided to them by Flutter considering the principles of confidentiality, necessity, and proportionality, particularly in reference to the collection and storage of personal information.

We expect our suppliers to have a written process in place to maintain data integrity and security.

3.2 Children and Young People in Communications

Suppliers should ensure that the brand and products of the entire Flutter group are never associated with, directed towards, young people and children through any marketing and communication activities.

In particular, suppliers should never use imagery of young people and children in marketing and communications activities in relation to their work with Flutter.

3.3 Material Non-Public Information

Material Non-Public Information (MNPI), also known as inside information, is information not known by the public but, if were, would likely affect the market price of securities issued by a company (ours or any other) or be considered important to a reasonable investor deciding to buy or sell those securities.

Buying or selling securities while in possession of MNPI that is acquired by virtue of supplier's relationship with Flutter is strictly prohibited, as is the communication of that information, whether expressly or by making a recommendation for the purchase or sale of securities based upon that information.

MNPI must be safeguarded and should only be shared with those who have a business need for knowing the information. Need-to-know is where such information is necessary to carry out one's job responsibilities and the sharing is in connection with fulfilling those responsibilities to Flutter.

3.4 Conflicts of Interest

Suppliers should disclose to Flutter any conflict of interest in their dealings with the company - whether actual, potential, or reasonably perceived.

Suppliers should not interact with our employees in a way that may either conflict or appear to conflict with the employee acting in the best interests of Flutter.



3 Business Ethics continued

3.5 Anti-Bribery and Anti-Corruption

We have a zero-tolerance approach to bribery and corruption. We do not, and will not, pay bribes or offer improper incentives to anyone for any purpose. Nor do we, or will we, accept perceived as such.

Suppliers may not offer or accept anything of value from business partners to obtain unfair business advantages. Gifts and hospitality bribes or anything that could be received or given should not be inappropriate in a way that could cause or could be seen to cause a person to improperly provide a business advantage or perform their role improperly or unlawfully. Any gifts or hospitality must comply with applicable laws and regulations. Political contributions and charitable donations can also be used to gain an improper benefit, and suppliers should have sufficient visibility and controls in place around these activities.

Suppliers and those acting on their behalf may not directly or indirectly offer, promise, authorize, recommend, give or receive anything of value, if it is intended, or could reasonably appear as intended to influence improper action or to obtain or retain an improper advantage for Flutter, the supplier, or a third party. To mitigate risk of potential bribery or corruption, suppliers should have processes in place to facilitate review and approval of exchanges of anything of value.

- Anything of value may include gifts (including cash and cash equivalents), business hospitality (including travel and related expenses, meals, entertainment), contributions to a charitable or political organization on behalf of another, Honoraria and speaker fees, visa letters, offers of employment or other work experience whether paid or unpaid, sponsorship, perks, or discounts.

Suppliers and those acting on behalf of suppliers are prohibited from providing or facilitating or expediting payment, usually a small amount of currency or other item or instrument of value, to any government official for his or her personal benefit to cause the official to perform, or to expedite performance of a routine duty or function that the official is required to perform (e.g. a payment to get through customs quickly).

Suppliers are also responsible for knowing and complying with the anti-corruption and bribery laws in the jurisdiction where the supplier operates. Suppliers may promptly report any violations or suspected violations that related to Flutter through either [Flutter's Speak Up Platform](#) or to their relationship manager at Flutter.

3.6 Tax Evasion

Flutter regards tax evasion to be the illegal avoidance or facilitation of the illegal avoidance of taxes by individuals and businesses. Suppliers are expected to maintain records to demonstrate legal business conduct.

3.7 Fraud

We expect suppliers to establish internal controls appropriate to their size and exposure to corruption or fraud and maintain on site any documentation that may be necessary to demonstrate compliance with applicable legislation.

Flutter

SPEAK UP

CRIMINAL BEHAVIOUR
WRONGDOING
MISCONDUCT
PRINCIPLES
ENVIRONMENTAL

PUBLIC INTEREST
ANONYMITY
SAFETY

HARASSMENT
RETALIATION
ABUSE
THEFT
BULLYING
CORRUPTION
DISCRIMINATION

SERIOUS CONCERNS
BREACH
SECURITY

CRIMINAL UNETHICAL CONDUCT
OFFENCE
ILLEGAL

IF YOU HAVE ANY SERIOUS CONCERNS OF WRONG DOING IN THE WORKPLACE, SPEAK UP IS AN INDEPENDENT WHISTLEBLOWING PLATFORM WHERE YOU CAN MAKE A CONFIDENTIAL AND ANONYMOUS REPORT.

[FLUTTER.INTEGRITYLINE.COM](https://flutter.integrityline.com)

4 Human Rights and Labour Standards

Flutter regards human rights as rights that are inherent to all human beings, regardless of race, sex, nationality, ethnicity, language, religion, or any other status. Human rights include the right to life and liberty, freedom from slavery and torture, freedom of opinion and expression, the right to work and education, and many more. Everyone is entitled to these rights, without discrimination.

4.1 Discrimination

Suppliers are expected to prohibit discrimination, harassment, victimisation, or any other form of inappropriate behaviour or abuse on any grounds including but not limited to age, disability, race, nationality, social or ethnic origin, sexual orientation, gender or gender identity, marital status, family status, pregnancy, physical appearance, political convictions, religious beliefs, or union membership.

Flutter has a firm commitment to enable equality of opportunity and workplace cultures that promote inclusion, and we expect our suppliers to do the same.

Flutter has a zero-tolerance attitude to abuse, including threatening to execute or executing any form of physical, psychological, sexual or verbal abuse, or any other form of intimidation. Our suppliers will establish a fair disciplinary procedure for tackling discrimination or intimidation where identified, and this procedure will be clearly communicated to workers.

4.2 Modern Slavery

Flutter is committed to preventing modern slavery in our business and supply chains.

We expect our suppliers to take sufficient steps to prohibit practices that are known to contribute to the risk of modern slavery. Modern slavery can take many forms, the most common of which are described below.

4.2.1 Child labour

Flutter firmly believes in the protection of children's rights. Our suppliers will only employ people who (whichever is highest out of the three below options):

- Meet the minimum legal age for employment
- Meet the minimum legal age for leaving compulsory education
- Are 15 years of age or older, the only exception will be in certain countries listed under ILO Convention 138 where the minimum age may be 14 years

Our suppliers should have adequate procedures in place to prevent child labour, including ensuring that employee age is verified with original identity documents and that they keep a register of the ages of all employees. If child labour is found, suppliers must immediately inform Flutter. We expect suppliers to ensure children are removed from work and put in place an appropriate remediation procedure to ensure the welfare of the child and their gradual transition into school. Suppliers will support the child or its family during this transition period.

4.2.2. Forced, bonded or involuntary labour

Our suppliers will not directly or indirectly use forced, bonded (sometimes referred to as debt bondage) indentured or compulsory labour, or involuntary prison labour or engage in human trafficking. All workers should be able to resign freely without any penalties, in accordance with local and national laws or regulations.

Our suppliers will not withhold payments of wages to workers, nor will they require them to pay recruitment costs, fees or lodge financial deposits or identity documents to secure or retain employment. Recruitment fees include but are not limited to payments for recruitment services offered by labour recruiters, payments in the case of direct or indirect recruitment

by the employer or third parties. Our suppliers will not recover recruitment costs from employees, even when allowed by local laws (e.g. foreign worker levies).

If fees are found to have been paid by workers, our suppliers will immediately reimburse all workers involved. Our suppliers will ensure they are conducting due diligence on recruitment agents and only work with agents and sub-agents that do not require workers to pay any form of recruitment fees.

Suppliers that are concerned about any issues related to modern slavery or suspect modern slavery in any parts of our business or supply chains should get in touch with their contact at Flutter immediately. Any concerns will be investigated.



4 Human Rights and Labour Standards continued

4.3 Wages

All employees should be paid a fair wage commensurate with prevailing industry conditions or the national minimum wage and ensure wages are paid in full directly to the worker at least monthly. Our suppliers will strive to pay wages that meet basic needs where legal or industry standards do not do so. Basic needs include food and housing expenses, as well as some discretionary income.

Our suppliers shall meet local legal requirements for overtime or local industry benchmarks, whichever is higher. Where local law does not stipulate a rate for overtime, our suppliers will pay a premium rate in line with ILO convention 30.

Deductions from wages that are not provided for by national law or local law should only be made if the employee has been informed about the deduction being made in advance, including why it is being made and how much is being deducted, and the employee has consented to the deduction in writing. The deduction is expected to be fair and reasonable, meaning it does not compromise the employee's ability to ensure a decent living income for themselves and their family or bring their total remuneration below the minimum wage level.

4.4 Working hours

Our suppliers should ensure that working hours do not exceed applicable contractual limits, and comply with local laws on working hours, paid holiday and rest days in the standard working week as defined in ILO Conventions C001 and C0014, and the spirit of the Universal Declaration of Human Rights Article 24 and the UN International Covenant on Economic, Social and Cultural Rights Article 7d. Our suppliers should ensure that all overtime is worked solely on a voluntary basis and comply with local laws on overtime or as defined by the relevant ILO Convention.

4.5 Recruitment and employment terms

We expect our suppliers to recruit in a transparent manner. Potential recruits and employees should understand the nature of work and terms and conditions at all stages of recruitment and employment. Workers are expected to be employed under a formal contract appropriate to their working arrangements and if a worker is being recruited from overseas, they should receive their contract prior to departing their country of origin. All effort should be made to ensure that contracts are either provided in, or translated to, native language (or an equivalent legible language) for employees (where appropriate). Contracts should not be changed unless changes are to meet local law and provide equal or better terms.

4.6 Freedom of association and collective bargaining

The rights of workers in relation to freedom of association should be respected including effective recognition for the right of collective bargaining. Our suppliers should not interfere in the employee's right to form, join, or not join a worker representation group and to bargain collectively. Our suppliers shall create an open environment for worker representation group activities, will not discriminate against group members and will develop a system for communicating and consulting with worker representatives. Where the right of freedom of association or collective bargaining is restricted under law, our suppliers will actively facilitate and not hinder the development of alternative means of association and bargaining.

4.7 Worker grievance mechanisms

As defined in ILO Conventions C168 and C173, Flutter expects suppliers to protect worker whistle-blower confidentiality and prohibit retaliation against workers who report workplace grievances. Suppliers are required to create a mechanism for workers to submit their grievances in a confidential and anonymous manner and maintain an effective process to investigate and address worker concerns.

5 Health and Safety

We expect suppliers to provide a clean, safe and hygienic workplace. Our suppliers should have a named senior representative overseeing the implementation of health and safety requirements.

Our suppliers will put reasonable measures in place to prevent fire, accidents, injuries and causes of hazards in a working environment. These measures will include appropriate training for relevant personnel, and ongoing risk assessment and systems review. Risk assessments and reviews should be documented, and suppliers should be able to provide this documentation upon request.



6 Environment

Flutter is committed to reducing the environmental impact of our business operations, through minimising energy and resource use and associated emissions across our operations. We expect our suppliers to share the same commitment. Furthermore, as part of the Go Zero pillar of our Positive Impact Plan, we've set a target to be Net Zero by 2035, aligned with Science-Based Target initiatives. As part of our ambition:

We expect suppliers to:

- Understand the environmental impacts of their own operations and ensure they have processes and plans in place to manage those impacts
- To co-operate and engage with us to meet the shared goal of reducing environmental impacts
- Have at least one senior manager with responsibility for environmental management and raising awareness inside their organisation
- Ensure that they operate with care for the environment including the handling of dangerous and hazardous materials. Any necessary environmental permits should be maintained

To do this effectively we encourage suppliers to:

Measure performance: Our suppliers should continuously measure, record and track consumption of energy use and emissions, waste, water, wastewater and hazardous materials or substances. We also expect our suppliers to have an understanding of how they impact on nature and biodiversity.

Set targets: Our suppliers should set targets to reduce their environmental impacts. We expect them to include but may not be limited to:

- Minimising energy consumption and setting greenhouse gas emission targets aligned with the science-based targets expectation for limiting global temperature warming to 1.5 degrees compared to pre-industrial levels
- Limiting water consumption to reduce contribution to global water scarcity
- Measuring and improving the quality of wastewater discharges
- Assessing and limiting waste where possible
- Managing the use and disposal of hazardous materials and substances; and
- Protecting and enhancing nature and biodiversity

Share data: Our suppliers should regularly share data with Flutter on the progress against their environmental targets. Where relevant and reasonable, we would encourage our suppliers to publicly disclose their targets and performance against those targets.

7 Reporting Concerns

Suppliers may have concerns or questions about the principles and standards set out in this Code of Conduct. If so, they should liaise with their local business contact, who in turn can contact their local Procurement team if necessary.

Suppliers wishing to report concerns or suspicions of wrongdoing or breaches related to this Code of Conduct may do so on an anonymous basis by contacting [Flutter's Speak Up Platform](#).

[Visit our website for further information on related Flutter corporate governance documentation.](#)



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