



# Anti-Corruption Code of Conduct



*December 2022*

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# Our raison d'être (purpose)

FDJ Group offers people who wish to experience the thrill of gaming and moments of emotion a wide range of responsibly designed games.

Gaming is our business, giving back to society is what drives us, and responsibility is our constant focus.

We promote recreational gaming by **accompanying our customers, creating games with built-in integrity, and reducing risks and consequences** arising from our activity; we actively help prevent addictive behaviour and underage gambling.

Faithful to the legacy of the French national lottery – created to help wounded World War One soldiers – we continue to support **social and community initiatives**, and fund good causes.

As key partners of local businesses, we ensure that our games and services are widely available through a dense network of neighbourhood retailers.

Thanks to our committed employees and capacity for innovation we are pursuing our goal of sustainable growth, underpinned by a **responsible and socially useful business model**, and close collaboration with our stakeholders.

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## Our six commitments

1

Developing a range of entertaining, upstanding and responsible games

2

Supporting our clients at every stage of their PoS and online gaming experience

3

Limiting problem gambling and preventing underage gambling

4

Stepping up our solidarity, societal and environmental initiatives

5

Promoting local businesses nationwide

6

Promoting our Responsible Gaming model worldwide

# Why do we need an Anti-Corruption Code of Conduct?

FDJ Group's Anti-Corruption Code of Conduct serves as a point of reference for the prevention and detection of corruption. It is an extension of our Ethics Charter, in line with local standards and regulations and international commitments.

## Who is it for?

The Code applies to **all FDJ Group employees**, regardless of where they are in the world and their position within the organisation. They must ensure that the decisions they take on a daily basis comply with the applicable regulatory framework and the principles and rules set out in the Code.

It is also aimed at **suppliers and contractors, business partners, sports partners, retailers and sub-contractors**. It sets out our expectations of them in terms of behaviour and ethics.

## What is it for?

The FDJ Group's Anti-Corruption Code of Conduct is designed to **guide our behaviours and actions on a daily basis**. It is founded on the Group's values, the type of activity we operate and the results of our anti-corruption risk assessment.

### It aims to identify:

- ◆ situations that could be seen as corrupt, involving abuse of influence or other breaches of probity,
- ◆ behaviours to be adopted and those to avoid to ensure we operate our business in an ethical manner,
- ◆ people to contact should you have any concerns.

It supplements the existing awareness and training initiatives.

**The Anti-Corruption Code of Conduct is an integral part of the Employee Handbook of the Group and all its subsidiaries.** It is supplemented by internal procedures which determine the rules to be followed by the Group's employees.

This Anti-Corruption Code of Conduct took effect from the date of its publication in October 2018, and was updated in April 2021 and in December 2022.

## Where can I find the Anti-Corruption Code of Conduct?

- ◆ On the Group's corporate website: <https://www.groupefdj.com/en>
- ◆ Employees can find it on the intranet.

## AN INTERNATIONAL REACH

FDJ Group fully commits to adhere to the requirements of the OECD Convention on Corruption, the French Penal Code, France's Sapin II Law (*Loi Sapin II*), the US Foreign Corrupt Practices Act (FCPA), the UK Bribery Act (UKBA), and all laws and regulations in force in the countries in which we operate.

Some national laws (*Sapin II*, FCPA, UKBA) apply outside the country, in other words they have a worldwide reach. This means a company can be prosecuted, and therefore sanctioned, under the law of several countries for the same act of corruption.

# A message from the Chairwoman and CEO of the Group



For FDJ Group, responsibility and serving the community are equally important as performance. This is what makes us tick. If we are to continue to pursue this responsible and socially useful growth model, then our day-to-day actions and behaviour must be beyond reproach.

Our Ethics Charter reflects the commitment we have made, FDJ Group senior managers and employees alike, to respect these ethical principles and values in everything we do. Combatting corruption is our number one priority.

FDJ Group does not tolerate corruption in form. This zero-tolerance policy sends a message of trust to our stakeholders, which in turn guarantees the long-term future of our business. We must all play an active part in preventing corruption within the Group. It goes without saying that our behaviour must be exemplary at all times. However, we must also be permanently on our guard in order to protect the Group, its managers and employees, from serious risks, including individual penalties.

Because the Anti-Corruption Code of Conduct is there to help us identify risky situations and guide us in the action we take, individually and collectively, I wanted it to be clear and instructive. In moments of doubt, we can refer to it to check that we are doing the right thing and complying with FDJ Group's rules, values and principles.

In addition, operating as part of the Audit, Risk, Control, Quality & Ethics Department, our anti-corruption compliance teams are there to answer our questions and guide us should we have any issues or concerns.

I know I can rely on each and every one of you to embrace this Anti-Corruption Code of Conduct and, in doing so, fly the flag for FDJ Group's culture of integrity.

**Stéphane Pallez**

FDJ Group Chairwoman and Chief Executive Officer

# Our ethical values and principles

FDJ Group's corporate values are innovative, optimistic, popular, committed and responsible. They must underlie everything we do in our daily work.

Our Ethics Charter reinforces our collective commitment to promoting these values. It is centred around FDJ Group's four fundamental ethical principles.

## 1. Compliance with laws and regulations

FDJ Group appeals to the sense of responsibility and honesty of each and every one of us to comply with the national and international laws and regulations which apply to our activities.

## 2. Sharing a culture of integrity

For FDJ Group, its reputation is paramount. It tells our customers that they are dealing with a legitimate organisation they can trust. This reputation is based on our governance, the transparency of our actions and decisions, and the behaviour of each and every one of us in the jobs we do and our relationships with others.

## 3. Respecting employees and related parties

Over and above its regulatory obligations, FDJ Group is convinced that its long-term future relies on the trust placed in it by its community of internal and external stakeholders, specifically its employees, partners and suppliers, shareholders, customers and all other related parties.

## 4. Engaging a constructive dialogue with civil society

As a major operator, FDJ Group is aware of its responsibilities to civil society, in particular consumer associations and non-governmental stakeholders charged with preventing excessive gaming and the protection of minors. As such, we are committed to going above and beyond our legal and regulatory obligations to promote ongoing progress and dialogue with our stakeholders.

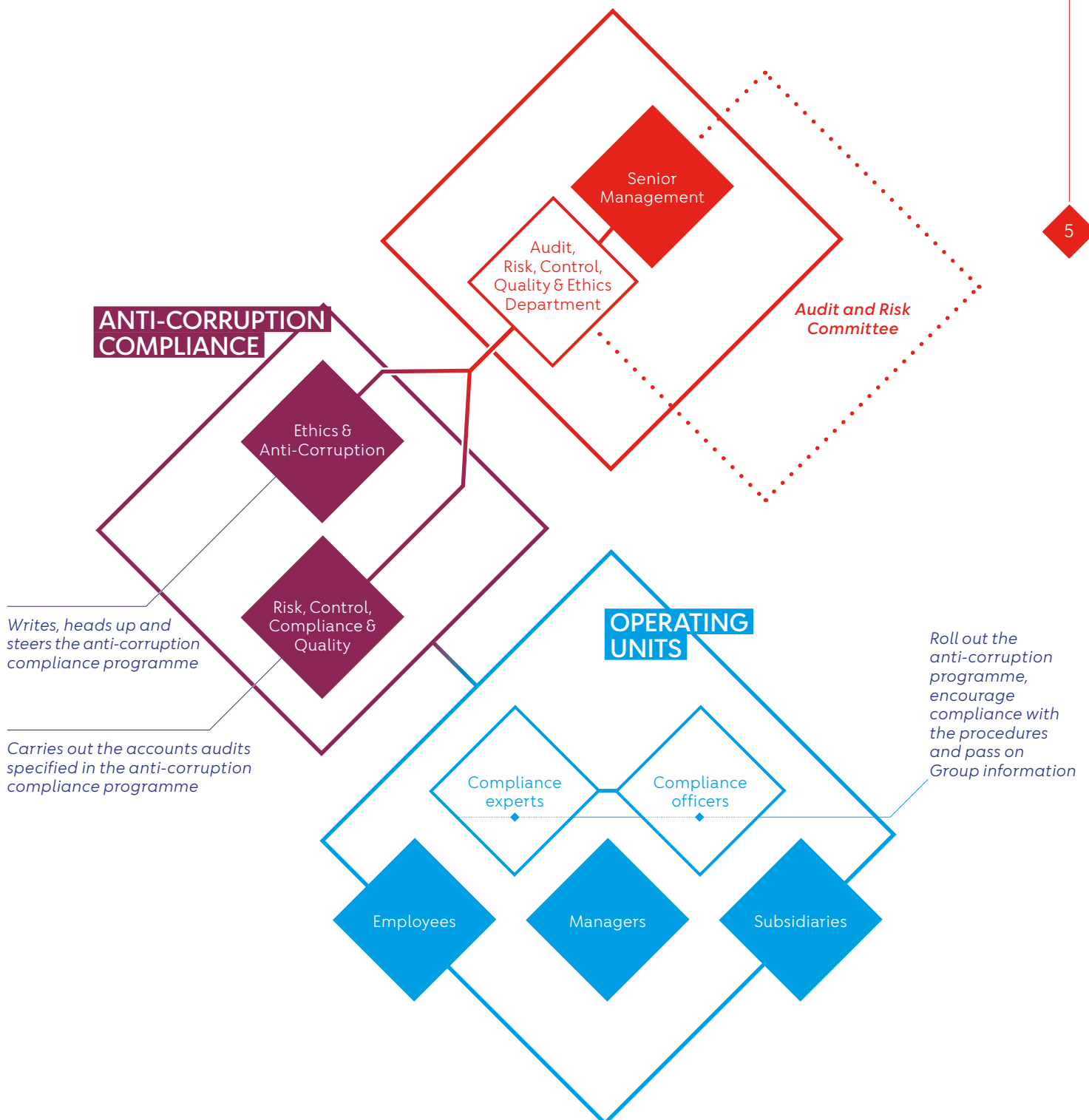
To find out more



FDJ Group's Ethics Charter can be accessed on our website. We can consult it to ensure that, in terms of ethics, we are taking the best possible decisions in our work, and in conducting Group business and interacting with stakeholders.

# Governance of anti-corruption compliance

Preventing and detecting acts of corruption are the responsibility of each and every one of us at FDJ Group. It starts at the top with senior management and is managed by a dedicated department and deployed with the support of compliance experts and officers.







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# Corruption Prevention

ALL TYPES OF CORRUPTION AND ABUSE  
OF INFLUENCE ARE STRICTLY PROHIBITED

Corruption is an activity that damages the economy as a whole. It exposes companies to many risks including financial penalties, reputational damage and/or criminal liability. The actions of all FDJ Group employees must be irreproachable at all times. Extra vigilance is required when we are working with public officials.

## Corruption is:

Promising, offering or giving to a third party (active corruption) or requesting or accepting from a third party (passive corruption),

- ◆ an undue advantage (money, travel, service, gift, entertainment, administrative authorisation, etc.),
- ◆ for yourself or someone else,
- ◆ to facilitate, carry out or be excused from carrying out a task relating to your job,
- ◆ either directly or through an intermediary.

## Abuse of influence is:

Benefitting from your (actual or presumed) influence, or promising to do so,

- ◆ to obtain or help to obtain,
- ◆ a favourable decision (contract, job, authorisation, etc.) from an authority.

## Corruption can be:

- ◆ **public** when it involves a **public official**, in other words a person who has public authority, a public service remit or holds a public elective office (local, regional, national),
- ◆ **private** when it involves only private sector individuals or legal entities.

**Penal sanctions** can be high for the company and also for the employee accused of corruption. In the UK, individuals found guilty of corruption face a penalty of up to ten years in prison and/or a fine.

Companies face fines of no maximum value, confiscation of financial gains, dismissal of the directors responsible and formal notification to put in place an anti-corruption programme.



## Breaches of probity at a glance

Extortion, favouritism and other breaches of probity are included in the generic term "corruption".

## We must...

- ✓ know and adhere to all the FDJ Group's corruption prevention procedures,
- ✓ be able to prove, at all times, that our actions were in good faith, prudent and transparent,
- ✓ run an integrity check on business relations before entering into a commitment,
- ✓ inform our business contacts of the rules in place to prevent and combat corruption and obtain their commitment to adhere to them.

## We must not...

- ✗ offer, promise or accept an illegal payment or benefit in return for influencing the result of a business decision,
- ✗ accept an unjustified, untraceable, cash payment of any sum of money,
- ✗ make facilitation payments, i.e. money paid to speed up or facilitate the approval of administrative procedures (obtention of consent, administrative authorisation, etc.),
- ✗ solicit the services of a third party to circumvent the rules or principles we must comply with.

## Get it right

### 1

An external auditor is about to deliver a mixed report about my department. I think about inviting him to the VIP box at a sporting event to talk about it.

- ♦ *Could this be conceived as corruption?*
- ♦ *Is my proposal in line with the FDJ Group's Gifts and Entertainment procedure?*

Under no circumstances should an employee offer or agree to a request for an illegal benefit aimed at influencing a decision.



### 2

A contractor slips some bank notes into their bid for a call for tenders.

- ♦ *Did I give this contractor any indication that I was open to this type of proposal?*
- ♦ *How would it affect the Group if this information was made public?*

**FDJ Group rejects corruption in any form.**

In this situation, I need to contact the ethics & anti-corruption team.

# Gifts and entertainment

ACT IN FULL TRANSPARENCY AND  
KEEP IT REASONABLE

Gifts and entertainment are commonplace in the business world. They do not constitute acts of corruption in themselves. However, in some circumstances, the person receiving them may feel a sense of obligation. Vigilance and transparency are absolutely vital to avoid any ambiguity and ensure that the decisions we make remain objective.

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## Gifts and entertainment cover perks or benefits of any kind such as:

- ◆ gifting material objects (pen, chocolates, watch, wine, etc.),
- ◆ an invitation to a restaurant, an evening event, a trip, a show or sporting event,
- ◆ paying an expense on behalf of the beneficiary (travel and/or accommodation costs, expense accounts, etc.).

Receiving the occasional gift or entertainment of a reasonable value is permissible in a business relationship. These practices may, however, be interpreted as being intended to influence

a decision or constitute an act of corruption. They may adversely affect our objectivity, judgement and ability to fulfil our duties.

To preserve our reputation, **FDJ Group will only permit the giving and accepting of courtesy gifts.** These must not be excessive. They must be consistent with best practice in the sector and comply with the regulations of the country in question. They must be given or received in full transparency.



## Gifts and entertainment at a glance

For your guidance, best practice is explained in FDJ Group's Gifts and Entertainment procedure. It also covers the rules governing sports hospitality. By following it you will be acting in accordance with the Anti-Corruption Code of Conduct.

## We must...

- ✓ ensure we apply the principles set out in FDJ Group's Gifts and Entertainment procedure,
- ✓ be aware of the potential context and significance of a gift or entertainment,
- ✓ not exceed the maximum value set for gifts and entertainment,
- ✓ ensure the gift or entertainment, given or accepted, is not excessive,
- ✓ familiarise ourselves with local practices and regulations,
- ✓ act in full transparency, logging the gift or entertainment in the register held by the ethics & anti-corruption team.

## We must not...

- ✗ accept or give a gift or entertainment:
  - ♦ of an excessive value,
  - ♦ to obtain an undue advantage or influence a decision,
  - ♦ on our own behalf,
  - ♦ that would be difficult to justify to our colleagues, friends and family or the media,
  - ♦ in secret, without informing other people,
  - ♦ to/from a person working for a regulatory or control body.

# Get it right

1

One of my suppliers offers me two tickets to the F1 Grand Prix while we are in the middle of negotiations.

- ♦ *Why does he want to give me these tickets?*
- ♦ *Does he, or does he seem to, expect something in return?*

It is strictly forbidden to give a gift to, or accept a gift from, a supplier or any business contact while they are consulting or negotiating with FDJ Group.



If the gift is appropriate, a box of chocolates for example, the basic rule is that you share it with your team.

2

One of my clients invites me to lunch at a restaurant after a business meeting...

- ♦ *Are we at a pertinent point in our relations (negotiating a contract, call for tenders, etc.)?*
- ♦ *Does the choice of restaurant allow me to adhere to the expenses policy?*

It is permitted to have lunch at a restaurant with a client (or supplier) provided the bill is not excessive and the invitations are not regular occurrences.

Best practice could simply be for each of you to settle your own bill.



# Conflicts of interest

DECLARE ALL ACTUAL OR POTENTIAL CONFLICTS OF INTEREST

A conflict of interest, even if only apparent, can adversely affect the objectivity, judgement or soundness of a decision. It puts the personal interest of an employee, or a third party, before the interest of FDJ Group. Identifying and declaring all personal connections will prevent this type of situation arising.

A **conflict of interest** arises when a personal interest (or personal activity) interferes, or is likely to interfere, with a FDJ Group employee's ability to do their job. They can affect our impartiality or cast doubt on our ability to fulfil our responsibilities objectively.

An apparent conflict of interest could damage FDJ Group's reputation and that of its employees. We must therefore show common sense and act appropriately in all situations where the objectivity of business situations could be called into question.

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## The following situations may lead to conflicts of interest:

- ♦ holding an elective office,
- ♦ holding a decision-making position (member of the Executive Committee or Board of Directors) at an association supported by the Group,
- ♦ dealing direct with a third party who employs friends or family members,
- ♦ a consultancy position or activity outside FDJ Group,
- ♦ hiring, or being involved in the hiring of, friends or family.



## Conflicts of interest at a glance

**For your guidance, best practice is explained in the procedure governing the prevention, declaration and management of conflicts of interest.**

**By following it you will be acting in accordance with the Anti-Corruption Code of Conduct.**

## We must...

- ✓ under all circumstances act in the sole interest of FDJ Group and refrain from seeking any personal benefit or interest,
- ✓ inform our line manager and the ethics & anti-corruption team if our actions are likely to give rise to a conflict of interest,
- ✓ declare our personal connections in the special register held by the Group's ethics & anti-corruption team,
- ✓ immediately withdraw from a decision making process if there is an actual or potential conflict of interest.

## We must not...

- ✗ conceal information about a conflict of interest, even if the conflict is only potential,
- ✗ take part, directly or indirectly, in a decision making process which involves:
  - ◆ friends, members of our family or, more broadly, people who share our business interests,
  - ◆ a structure in which we, directly or indirectly, hold a stake,
- ✗ accept an assignment or work from a supplier, client or competitor that may affect our judgement in the exercise of our own duties,
- ✗ bet on a sports event through FDJ Group, personally or through an intermediary, online or at a retail outlet.

# Get it

# right

1

My neighbour asks me to pass on his CV to the FDJ Group's HR department.

- ◆ *Is it possible he will receive favourable treatment because of my intervention?*
- ◆ *Will he feel indebted to me?*

You can pass on a neighbour's or friend's CV to HR provided you declare the connection in full transparency.

In fairness to the other candidates you may only pass on the CV, nothing more.



2

I am friends with the Purchasing Manager of one of FDJ's strategic suppliers.

- ◆ *Could this relationship be construed as a conflict of interest?*
- ◆ *Will I be called to take part in the decisions taken with respect to this supplier?*

I must declare this connection in the dedicated register. The ethics & anti-corruption team will decide on the precautionary measures to put in place.



For example, I may be required to withdraw from the decision making process if this supplier takes part in a competitive bidding process.

# Integrity of business relations

ENSURE THE INTEGRITY OF OUR PARTNERS AND SUPPLIERS

FDJ Group is expanding globally and developing new activities. The reputation and actions of our partners, suppliers and intermediaries could have severe consequences for our Group and its image. Before entering any business relationship with a third party, and for the duration of the relationship, we must ensure its integrity.

As part of their jobs, FDJ Group employees are required to interact with different types of third parties. In each of these relationships, they must act with integrity and ensure that the third parties they work with share our ethical standards.

Under the terms of this Code, **a third party** is any person or legal entity with a contractual relationship with FDJ Group. This may be a supplier, sub-contractor or service provider, client, intermediary, business or sports partner, a business in which we hold stakes, a joint venture, etc.

## Specific relationships

**Patronage** is the financial or material support provided, without compensation, by an individual or company for an initiative or activity serving the common good (culture, solidarity, research, environment).

**Sponsorship** is defined as the provision of goods or money to support an activity or event organised by a commercial organisation. The aim is for the sponsor to benefit through marketing and communications in return.

**Institutional relations** and **lobbying** (or representation of interests) are recognised, legitimate communications activities on behalf of companies. Lobbying aims to present a company's arguments and constraints to the public decision making bodies and forge close relationships with civil society and communities.

All the above activities must adhere to the strictest rules of ethics and transparency.



## Business relationships at a glance

There are several complementary procedures in place to help you adhere to the Anti-Corruption Code of Conduct. These are the third party evaluation procedure, the patronage management procedure, the Institutional Relations and Representation of Interests Charter and the special third party M&A procedure.



## We must...

- ✓ apply the third party evaluation procedure before entering into any commitment,
- ✓ ensure that the third party adheres to their anti-corruption obligations throughout the business relationship,
- ✓ ensure that all patronage is conducted in accordance with the patronage management procedure,
- ✓ respect our political, religious and philosophical neutrality in everything we do,
- ✓ refrain from making any contribution, financial or in kind, to a political party on behalf of FDJ Group.

## We must not...

- ✗ enter into a contractual relationship with a third party without having applied the third party evaluation procedure,
- ✗ embark on negotiations with a view to acquiring or taking a stake in a company without having applied the special third party M&A procedure,
- ✗ use a third party to undertake actions that contravene the law or the Code of Conduct,
- ✗ use unfair means to obtain information or decisions from public authorities,
- ✗ help to fund political parties.

# Get it right

## 1

I would like to enter a contract with a new supplier but the deadline is tight.

I will carry out the internal formalities (third party evaluation procedure) once the contract is signed.

- ♦ *Am I totally sure that I am entering a relationship with a trustworthy partner?*
- ♦ *What are the consequences for FDJ Group if this supplier's practices are objectionable?*

I must not enter into any commitment without having evaluated the third party and before I have consulted the ethics & anti-corruption team or my anti-corruption compliance officer.



FDJ Group's reputation could suffer if the behaviour of one of its partners is unethical or, worse, illegal.

## 2

Having submitted an extremely competitive bid, a supplier has a very strong position in a call for tender procedure.

However, on evaluation, the team realises the supplier is implicated in a corruption scandal.

- ♦ *Can I continue the call for tender process with this supplier?*
- ♦ *Could the act of corruption compromise the quality of the services provided by this supplier?*

I must only deal with service providers for whom I hold complete and verified information. I must be wary of complex or unusual business relationships. These must be approved by the ethics & anti-corruption team.



I must ensure that FDJ Group's business contacts are fully informed of our ethical standards.

# Patronage, sponsoring and institutional relations

Social Responsibility has been a core element of the FDJ's business model since it was founded. Each year, the Group supports a number of projects connected with its missions for the common good or which fit with the objectives of its Corporate Foundation.

FDJ Group has put in place **policies and internal procedures** governing its patronage, sponsorship and institutional relations to ensure that they do not expose it to the risk of corruption. This helps to ensure the Group and its employees act with honesty and integrity and in full transparency.

The Group applies a **strict policy of political neutrality** in all its locations. It never helps to

fund a political organisation. It respects the right of its employees to involve themselves, personally, in political activity provided that:

- ♦ it is clear that, in doing so, they do not represent the company,
- ♦ they adhere to the procedure governing the prevention, declaration and handling of conflicts of interest.

Get it

right

**1** My daughter is a volunteer for an association that could receive funding from the Group as one of its patronage initiatives. I am on the decision making panel or committee that would select this association.

- ♦ *Is the charity initiative a good fit for FDJ Group's values and its Foundation's objectives?*
- ♦ *Is there any way that the committee or panel could be impartial in its decision?*

If a conflict of interest situation arises, I must protect myself and the Group by informing my line manager and/or the decision making body, and also the ethics & anti-corruption team.

The ethics & anti-corruption team will contact me to log an entry in the conflicts of interest register and put in place appropriate measures, if applicable.

**2** I am in discussions with an elected councillor regarding authorisation for a strategic project. He indicates to me that it would be a good idea for FDJ Group to "take part in" his re-election campaign.

- ♦ *Does this request meet our neutrality criteria?*
- ♦ *Have I given any indication in my discussions with the government that I have an allegiance to a particular party?*

FDJ Group strictly forbids the funding of political parties.

Political preferences of any type must never be mentioned in a business context as this could put you in an awkward position with your partners.



# Player relations

FDJ Group makes every effort to protect its players, and its winners in particular. We act with discretion at all times, thus guaranteeing the anonymity and confidentiality of our winners.

As a leading lottery Group in this field, FDJ Group has a Winner Relations Department. With experience going back many years, FDJ Group can accompany the winners every step of the way.

## Did you know

The employees of FDJ Group's Winner Relations Department receive special anti-corruption training to guide their dealings with winners.

## We promise to:

- ◆ support them steadfastly and effectively,
- ◆ prevent conflicts of interest and the risk of fraud and corruption,
- ◆ guarantee the protection of their personal data and respect their privacy,
- ◆ protect the Group's reputation.

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## Get it right

- 1 A winner invites me to lunch to "celebrate his win" with his family.
  - ◆ I must notify my line manager and the ethics & anti-corruption team.
  - ◆ I thank him but must tell him I cannot accept. I must explain that FDJ Group's Gifts and Entertainment procedure does not permit me to do so in order to protect winners from solicitation.

We are not permitted to accept any gifts or benefits from winners.



- 2 I am offered a sum of money to pass on the list of the big money winners to a company.
  - ◆ I must absolutely refuse.
  - ◆ I must notify my line manager and the ethics & anti-corruption team.

FDJ Group rejects fraud and corruption in any form.

It is not permitted to accept a personal cash payment.

Furthermore, it is not permitted to respond to any request that would endanger the Group's reputation or be harmful to big money winners.



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# The ethics whistleblowing system

ASK QUESTIONS AND SHARE YOUR CONCERNS

FDJ Group has put systems in place which enable you to ask for advice if you have questions or doubts, and to flag up situations that may be illegal or infringe the Anti-Corruption Code of Conduct or more broadly our ethical principles.

Employees and external stakeholders have access to an ethics whistleblowing system via the online secure FDJ'ALERT platform. It guarantees strict confidentiality and the protection of personal data.

The ethics whistleblowing system complements the Group's other channels of communication (the Diversity & Inclusion team, the employee representative bodies, the HR business partners, etc.).

The FDJ Group's employees and external stakeholders can thus report any breach of the rules of this Anti-Corruption Code of Conduct and, and more broadly any breach of the ethical rules (harassment, discrimination, etc.).



## The ethics whistleblowing system at a glance

Detailed instructions on how to use the ethics whistleblowing system can be found on the Group intranet.

The FDJ'ALERT platform will take you through the process, step by step (available in French and English):

<https://report.whistleb.com/en/fdj>

**We can all do our bit to prevent any kind of ethics risks.**

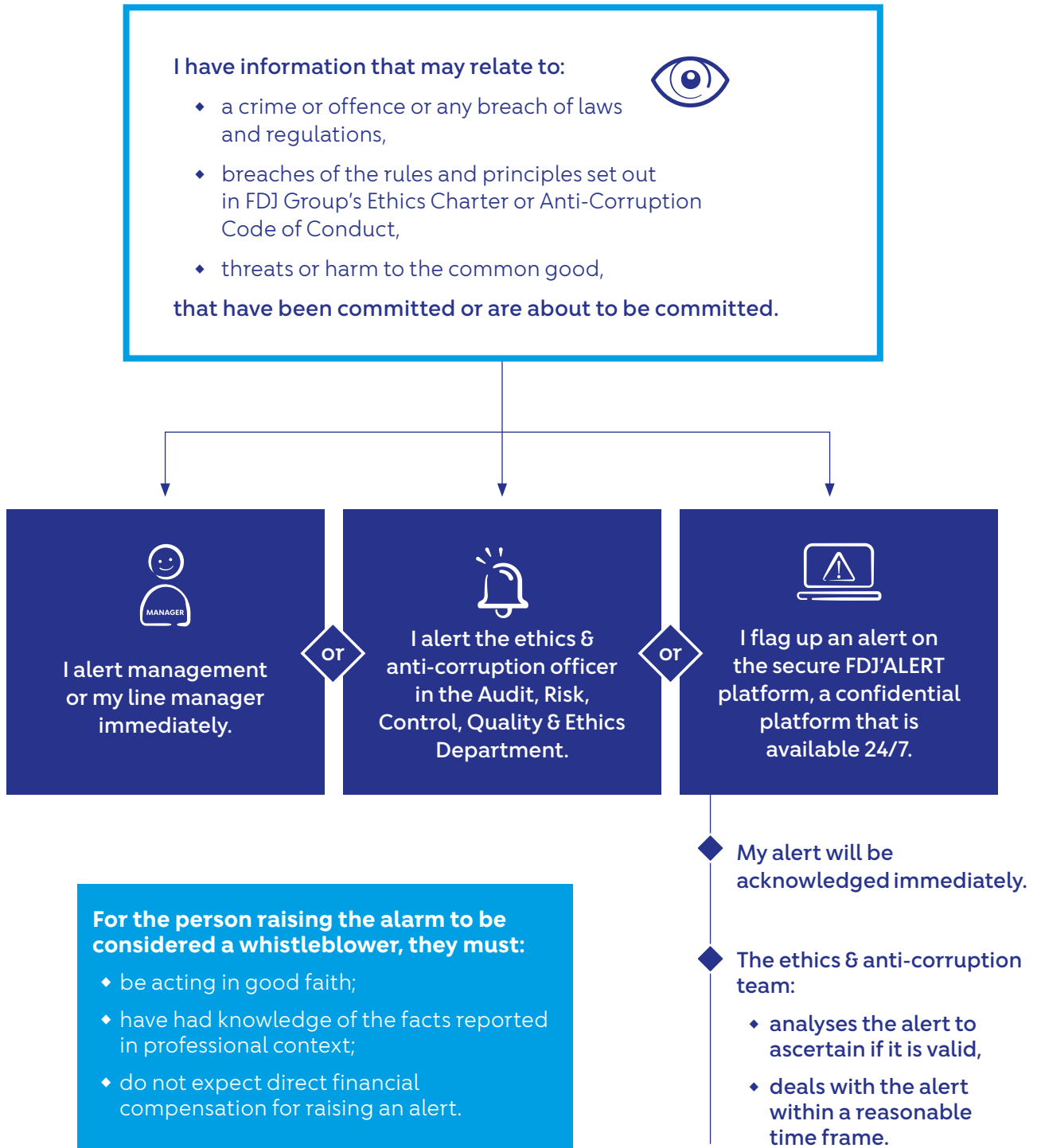
### Respecting confidentiality and protecting the whistleblower

The whistleblower should not be penalised. Although, anonymous reporting is possible, the processing of the report will be more efficient if the whistleblower identifies himself.



*“If I declare facts in good faith and the facts turn out to be wrong am I likely to face legal or disciplinary action?”*

*No. You can get things wrong. The important thing is to act objectively and in good faith.”*



The ethics whistleblowing system set up within the Group guarantees the independent and the confidential treatment of alerts raised, whether you are FDJ Group's employee or external stakeholder. This system complies with the law aimed at strengthening the protection of whistleblowers. This law also specifies the procedures for collecting and reporting an alert to the competent external authorities (list annexed to the French decree n°2022-1284).

# What if I am unsure?

The Anti-Corruption Code of Conduct is there to enable us to act with integrity and to inspire our day-to-day behaviour. It covers the main situations we may face day to day in our jobs. It cannot, however, cover all situations.

Some situations can be difficult to handle because acting ethically requires more than simply following a set of rules. FDJ Group encourages dialogue. All employees are asked to express their doubts freely and ask questions.

In general, if you are unsure about a situation, the basic rules are as follows:

- ◆ do not try to sort it out yourself,

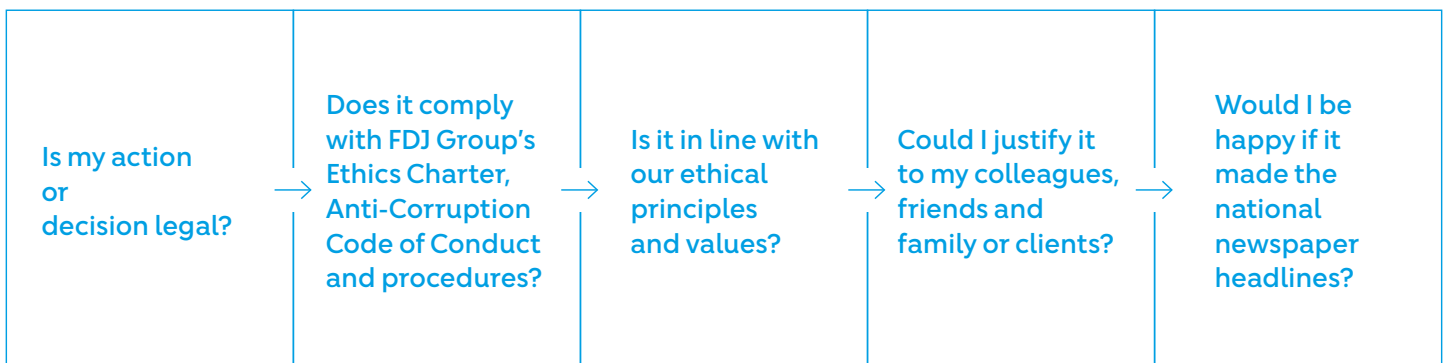
- ◆ consult other people (your line manager, HR business partner, compliance officer, the ethics & anti-corruption team, etc.),
- ◆ be honest and sincere.

You can always use the **ethics whistleblowing system** which, if you do, guarantees you added protection. You are not however obliged to use it.

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## If unsure, ask yourself the following?



If your answer to one of these questions is no, or if you are unsure, discuss it directly with your line manager, compliance officer, HR business partner or ethics & anti-corruption team.



# Disciplinary procedure

## WHAT HAPPENS IF I BREACH THE CODE?

**Failure to comply with the rules and principles of this Anti-Corruption Code of Conduct may result in legal and disciplinary action.**

The Anti-Corruption Code of Conduct is an integral part of FDJ's Employee Handbook. In line with this Employee Handbook and, where applicable, its local version, employees breaching the anti-corruption rules of the Code may, where justified, face disciplinary

action ranging from a reprimand to dismissal for misconduct or gross negligence.

In addition, employees breaching these rules and principles may face criminal and/or civil prosecution.

**Do you work at FDJ Group or one of its subsidiaries?**



There is a network of compliance officers in place to support you in your day-to-day job.

You are protecting yourself and the company.

# Some definitions...

## Public official

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Any person who holds a public office, i.e. has public authority, a public service remit or holds a public elective office. This may be a mayor, an employee of the national games regulator or a front-line worker at an authority.

## Corruption

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Promising, giving to, or requesting or receiving from, a third party, either directly or indirectly, an undue advantage for yourself or someone else, to facilitate, carry out or be excused from carrying out a task relating to your job. It can be private (between two private stakeholders) or public (involving a public official).

## Facilitation payments

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Paying small undeclared sums of money to speed up or secure a decision from a public body (obtaining consent, administrative authorisation, etc.). Also called a backhanders.

## Bribery

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An undue offer or benefit (cash, gifts, a trip, job offer, etc.) in return for a favourable decision.

## Third party

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A third party is any person or legal entity with a contractual relationship with FDJ Group. This may be a supplier, sub-contractor or service provider, client, intermediary, business or sports partner, a business in which we hold stakes, a joint venture, etc.

## Abuse of influence

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Cashing in on your actual or presumed influence, or promising to do so, to obtain or facilitate a favourable decision from an authority (public tender, public position, etc.)

## Gaming

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References to gaming in this document include all forms of sport betting offered by the Group.

# Key points

## Our actions must be guided by the following ethical principles:

1. **compliance** with laws and regulations,
2. **sharing** a culture of integrity,
3. **respecting** employees and related parties,
4. engaging a constructive **dialogue** with civil society.

## To prevent risky situations:

- ◆ Remember that all forms of corruption are strictly prohibited.
- ◆ For gifts and entertainment, act in full transparency and avoid excessive gestures.
- ◆ Declare all actual or potential conflicts of interest.
- ◆ Ensure the integrity of our partners and suppliers.
- ◆ If unsure, don't handle it alone.

To contact the ethics & anti-corruption team:



[conformite.ac@lfdj.com](mailto:conformite.ac@lfdj.com)



## If unsure, ask yourself the following:



If you are struggling to decide about the ethics of a decision, the golden rule is to raise your questions, openly, with



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