

# Human rights policy.

EDITION 2023

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## THE APPROACH OF THE FDJ GROUP

THE AIM OF THE FDJ GROUP'S HUMAN RIGHTS POLICY IS TO DEFINE THE HUMAN RIGHTS COMMITMENTS OF THE FDJ GROUP APPLICABLE TO ITS ENTIRE VALUE CHAIN. THIS POLICY PROVIDES A REFERENCE FRAMEWORK OF THE RULES TO BE APPLIED DAILY IN ALL THE ACTIVITIES OF THE GROUP.

### A. COMMITMENT OF THE FDJ GROUP

**The FDJ Group respects all internationally recognized fundamental human rights and shall make every effort to implement the measures necessary to identify and prevent potential adverse impacts or to remedy the existing adverse impacts of its own activities or those of its value chain.**

The FDJ Group also wishes to make a positive contribution to human rights by operating as a business endowed with corporate social responsibility. The Human Rights Policy provides a formal statement of this commitment and reaffirms the fundamental place of human rights in the managerial and operational approach of the Group and in its relations with its stakeholders.

In accordance with this commitment, the FDJ Group applies internationally recognized standards in the domain of Human Rights. In particular, this policy is based on the following reference standards: **the Universal Declaration of Human Rights, the International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work, the United Nations Guiding Principles on Business and Human Rights, the Tripartite Declaration of Principles concerning Multinational Enterprises and Social Policy (MNE Declaration) and the OECD Guidelines for Multinational Enterprises.**

This commitment is fully in line with the strategic vision of the Group and with its vigilance approach.

### B. SCOPE OF APPLICATION

**The responsibility of the FDJ Group is to ensure the respect of human rights in every part of its value chain:**

- ◆ **EMPLOYEES:** all employees, regardless of the nature of their contracts, including temporary and intermittent employees, in all countries and territories where the Group is established (France, United Kingdom, French Polynesia and Canada),
- ◆ **SUPPLIERS/SUBCONTRACTORS:** all suppliers having business relations with the FDJ Group,
- ◆ **BUSINESS PARTNERS:** all business partners in our network,
- ◆ **CUSTOMERS:** players of our online and PoS lottery and poker games and sports betting systems and all consumers of our PoS and online payment services,
- ◆ **OTHER THIRD PARTIES:** all other stakeholders bound by contracts other than business contracts (sponsorship, partnership, NGOs etc.).

This Policy applies to all entities of the FDJ Group.

The FDJ Group complies with the national laws and regulations of every market in which it operates.

Whenever the FDJ Group encounters conflicts between internationally recognized human rights (specified in the texts and documents cited above) and local laws, the Group and its entities shall apply the stricter and more virtuous of the conflicting legislations pertaining to human rights.

## C. DISTRIBUTION AND COMMUNICATION

**This Human Rights Policy is available to every employee of the Group via the Group's internal communication systems. It is available in French and English.**

To promote its human rights commitments and ensure the broadest possible accessibility of this Policy, the FDJ Group undertakes to provide information and regular coaching of its employees on subjects relating to human rights.

The Group also undertakes to promote this Policy to its external stakeholders and business partners. The Policy is also distributed on the official website of the FDJ Group.





## THE MAIN HUMAN RIGHTS RISKS

THE TABLE BELOW SHOWS THE MAIN RISKS, CLASSIFIED ACCORDING TO THE NATURE OF THE STAKEHOLDERS CONCERNED. THE MEASURES TAKEN TO PREVENT ADVERSE EXTERNAL HUMAN RIGHTS IMPACTS ARE DESCRIBED BELOW IN THE SECTION “COMMITMENTS TO STAKEHOLDERS”:

### A. MAIN IDENTIFIED RISKS

MAIN STAKEHOLDERS	IDENTIFIED RISKS
<b>EMPLOYEES</b>	<ul style="list-style-type: none"> <li>◆ Psychological and sexual harassment of employees</li> <li>◆ Discrimination and inequality of opportunities in the recruitment and career progression of employees</li> <li>◆ Poor working conditions of employees</li> <li>◆ Insecurity of employees</li> <li>◆ Restriction of the freedom of association and degradation of social dialogue with its employees</li> </ul>
<b>SUPPLIERS / SUBCONTRACTORS</b>	<ul style="list-style-type: none"> <li>◆ Poor working conditions at suppliers and subcontractors</li> <li>◆ Forced labour and child labour at suppliers and subcontractors</li> <li>◆ Restriction of the freedom of association and degradation of social dialogue at suppliers and subcontractors</li> </ul>
<b>CUSTOMERS</b>	<ul style="list-style-type: none"> <li>◆ Insufficient protection of vulnerable players</li> <li>◆ Failure to comply with regulations concerning the prohibition of minors from participating in games of chance and sports betting</li> <li>◆ Lack of transparency regarding game conditions</li> <li>◆ Inciting to excessive consumption</li> </ul>
<b>ALL STAKEHOLDERS OF THE FDJ GROUP (EMPLOYEES, BUSINESS PARTNERS, SUPPLIERS/ SUBCONTRACTORS, CONSUMERS)</b>	<ul style="list-style-type: none"> <li>◆ Failure to respect human rights in relation to sponsoring and/or corporate patronage</li> <li>◆ Inadequate measures to combat sports corruption and match fixing</li> <li>◆ Non-respect of human rights by the FDJ Group's business partners</li> <li>◆ Inadequacy of the whistleblowing reporting system</li> <li>◆ Inadequate protection of personal data</li> </ul>

## B. METHODOLOGY OF RISK IDENTIFICATION AND RATING

The process of identifying and prioritizing the main human rights risks of the FDJ Group has been established on the basis of a specially tailored methodology derived from the main internationally recognized standards and recommendations.

### RISK IDENTIFICATION:

- ◆ **Identification of a list of challenges concerning, in particular, workers' rights and consumer rights** relating to the betting and gaming industry,
- ◆ **Definition of a global risk universe** based on the challenges identified above,
- ◆ **Selection of 17 risks considered to be of higher priority** in the context of the betting and gaming sector and the environment of the FDJ Group, based on interviews with various employees of the FDJ Group and with members of senior management.

### RISK PRIORITIZATION:

- ◆ **Conduct of a series** of risk rating interviews in various departments and business units of the FDJ Group (General Management, Employee Experience and Transformation, Legal, Risks, Purchasing, Commitment and Responsible Gaming, Security, Sponsoring and Sports Partnerships, Integrity in Sport, Sales etc.),
- ◆ **Human rights** risk mapping as a function of the criticality level (taking into account the severity and frequency of occurrence of the risk) and the risk management level.





## COMMITMENTS TO STAKEHOLDERS

THE FDJ GROUP UNDERTAKES TO ITS STAKEHOLDERS TO ESTABLISH THE RESOURCES NECESSARY TO PREVENT AND ATTENUATE ADVERSE IMPACTS ON HUMAN RIGHTS.

### A. EMPLOYEES

The FDJ Group shall make every effort to **combat all forms of:**

- ◆ **Psychological and sexual harassment** of any of its employees (including sexual and sexist violence and conduct),
- ◆ **Discrimination**, with regard to the criteria specified in:
  - The international conventions and European regulatory texts that define a set of fundamental criteria based on the personal characteristics of the individual (age, sex, disability, sexual orientation, gender identity etc.).
  - French legislation, which has added various specific criteria, including criteria referring to classic factors of discrimination (nationality, name or physical appearance) or to specific situations (place of residence, loss of autonomy etc.).
- ◆ **Inequality of opportunity** during the career path of employees in the FDJ Group. Starting from recruitment and extending through their entire career, all employees must be treated fairly (access to training, promotion, career advancement, remuneration, company benefits etc.).

The Group has several internal counselling and dialogue mechanisms for identifying and reporting any information relating to suspected harassment or discrimination at work. Several reporting channels are available to employees, such as the whistleblowing reporting system, contact persons for reporting sexual harassment, employee representatives, HR contacts, including the Diversity and Inclusion team. Every report of workplace harassment is processed and investigated internally. "Sexual harassment" contacts have been designated in the Human Resources departments and Works Council / Economic and Social Committee to support and guide employees to the most appropriate solutions. Psychological assistance is available to employees. Additionally, the Group raises awareness of these questions among all its employees via internal training.

In terms of specific measures, the Group has established a Group Diversity and Workplace Equality and QWL (Quality of Work Life) Policy.

**Compliance with this policy is ensured by:**

- ◆ Aligning the corporate and human resources management processes with the priorities defined in the policy,
- ◆ Negotiation of agreements between management and employees that include the actions and indicators necessary to put the policy into practical operation,
- ◆ Internal communication to all employees, accompanied by a training plan for all key players in the field of diversity.

A Group-wide agreement on gender equality, quality of work life (QWL) and diversity has been unanimously signed.

The impact of this policy is monitored and measured by various internal barometers of the sense of inclusion, commitment and wellbeing in the workplace.

To prevent any degradation of employee safety (safety of employees in their working environment), which can lead to workplace accidents, occupational diseases, psychosocial risks etc., the principle of precaution and safeguarding is applied throughout the FDJ Group.

Additionally, through anticipation, detection and protection against threats caused by deliberate malicious acts (attacks, intrusions, occupation of the premises, industrial espionage, cyber-attack, theft of property, kidnapping, vandalism, verbal and physical aggression etc.), the FDJ Group guarantees the safety of its employees at all its sites and during their work-related travel.

For this purpose, the FDJ Group draws up safety risk audits for each site, including sales offices, implements suitable protective measures (human surveillance, video surveillance, access authorization, perimeter security etc), utilizes dedicated safety intelligence and maintains close links with the authorities.

Similarly, specific mechanisms have been deployed to protect employees and participants at events organized by the Group outside its premises.

Moreover, mandatory training courses and awareness raising programmes are provided to all employees to guarantee a good level of knowledge of the risks and of the expected conduct.

Finally, situations such as road accidents, epidemics, conflicts, criminal acts (including cyber-crime and information theft), terrorism and political and social instability can threaten the health and safety of employees during their travel abroad, in a context where they are confronted with risks and environments that are unfamiliar to them.

To help handle these risks, the FDJ Group provides support to each employee during their work-related travel, by providing information concerning the destination, validating in advance all planned travel in higher risk countries, establishing emergency reporting facilities and providing practical assistance if necessary.

The FDJ Group implements various measures to establish a **foundation for the provision of satisfying working conditions for all its employees by combating poor working conditions** (job insecurity, unstable employment of limited duration, indecent remuneration, excessive working hours, unsafe buildings, arduous tasks etc.).

The relevance of these measures derives from their preventive effect and their application to all employees and to the corresponding levels of line management. For example, the Group provides its managers and employees with training in OHS. Moreover, internal and external audits of the OHS management systems are performed. An internal climate barometer is published annually. In addition, the Group provides its own specific benefits.

### ◆ **The FDJ Group goes beyond the regulatory requirements concerning social dialogue** ◆

In particular, the exercise of union rights is recognized in the FDJ Group, in accordance with the rights and freedoms guaranteed by the applicable constitutional, international, European and national provisions (laws, regulations and collective bargaining agreements) concerning freedom of association, trade union freedom and collective bargaining rights. For example, employees are free to join, form or organize the trade unions of their choice and to engage in collective bargaining. No interference with the operation of these organizations is tolerated. Nor are any discrimination, intimidation or reprisals against employee representatives or employees participating in this type of activity.

The FDJ Group undertakes to maintain high-quality social dialogue in every entity. Each entity of the Group has employee representative bodies corresponding to its configuration. Consequently, all projects concerning the general operation of

## **B. CUSTOMERS**

Consumers are at the heart of the FDJ strategy. The Group has developed a consumer-centred business model based on identifying and knowing the online and PoS players, in order to build customer relations that create value while at the same time taking particular care to reinforce the Group's responsible gaming policy. In applying this responsible gaming policy, which has been developed over more than 20 years, FDJ has established a series of mechanisms to combat underage gambling and to prevent problem gambling among its players.



As a major reference on the French games of chance market, the FDJ Group has a duty to **comply with the legal provisions concerning the prohibition of minors from participating in games of chance and sports betting.**

To combat the accessibility of its games to minors, the FDJ Group trains its sales force and business partner network to refuse sales to minors. The Group also regularly conducts campaigns among its business partners to assess the effectiveness of training and to reinforce the controls established by its business partners. Punitive measures can also be applied and can culminate in the withdrawal of FDJ's seal of approval.

Certain categories of people (senior citizens, disabled persons, gambling addicts, financially unstable persons etc.) are vulnerable to the offers proposed by FDJ. Access to these offers can put these people in physical, psychological and social danger. To assess the risks associated with gaming practices, FDJ annually monitors various indicators for its online games. On the user's fdj.fr account, high visibility is given to the tools and services available for player assistance and to the availability of the gambling moderator. On the basis of the charts used to rate the attractiveness of its game offers, the Group has developed a new tool to assess the attractiveness of its promotions.

◆ **FDJ is also carrying out trials of a targeted prevention approach based on the segmentation of risk behaviours on the website [www.fdj.fr](http://www.fdj.fr), aimed at encouraging players to set limits or to take breaks from gaming.** ◆

In view of the risks inherent to excessive participation in games of chance and sports betting, responsible gaming practices must be promoted to limit the incentive to play. To **deter excessive consumption of FDJ products and services**, the Group promotes business communications that comply with the regulations concerning non-solicitation of minors.

The Group has also issued a Responsible Communication Charter to the employees and service providers involved at each stage of the conception and distribution of the Group's communication campaigns. This Charter is designed to ensure that all communications comply with a vision of responsibility and the promotion of recreational games exclusively reserved to adults.

To **ensure maximum visibility of game conditions**, information on gaming conditions is systematically presented on the website and oXn the physical game media.





## C. SUPPLIERS

For the FDJ Group, respect for human rights all along its supply chain is a key criterion in its relations with its suppliers.

The aim is, first, to ensure the commitment of each supplier to respect human rights for the full duration of their business relations with the Group and, second, to identify the potential risks in the act of purchasing and all along the supply chain, in order to eliminate any serious violations of human rights.

In this context, the FDJ Group ensures that all its suppliers undertake to comply with the requirements of the present Policy, the relevant international standards (the International Labour Organization Declaration, the Universal Declaration of Human Rights, the United Nations Guiding Principles, the Tripartite Declaration of Principles and the OECD Guidelines) and the regulations applicable in the countries where the companies conduct their activities.

For example, the Group requires its suppliers to sign the "Charter of Supplier CSR Commitments", covering all the required commitments on respect for the environment and human rights and to demonstrate exemplary conduct in terms of their social responsibility.

### In particular by:

- ◆ **PROHIBITING** any recourse to forced or compulsory labour and employee mistreatment. This includes the prohibition of any practice of modern slavery and human trafficking,
- ◆ **ELIMINATING** child labour,
- ◆ **THE ABSENCE OF DISCRIMINATION:** no distinction, exclusion or preference may be founded on colour, sex, age, language, religion, sexual orientation or identity, national or social origin, opinion or disability,
- ◆ **RESPECT** for health and safety, by guaranteeing working conditions and a workplace environment that are healthy, safe and consistent with human dignity to its own personnel,
- ◆ **ALLOCATING** a decent salary and decent working hours, by paying a minimum wage that meets fundamental needs and by complying with the legislation on working hours and rest times applicable in the countries where they operate,
- ◆ **RESPECT** for freedom of expression, union rights and collective bargaining rights.

This Charter is an integral part of the contractual provisions signed between FDJ and its suppliers. In the event of non-compliance, each of the entities of the FDJ Group having business relations with the supplier in question reserves the right to demand correction of these nonconformities, to suspend purchases and to terminate its relations with said supplier.

Also, since 2012, the Purchasing Department has been committed to a Responsible Purchasing approach through the signature of the "Responsible Supplier Relations and Purchasing" Charter. In 2021, the Group was awarded the official French certification for responsible supplier relations and purchasing ("Label Relations Fournisseurs et Achats Responsables") awarded by the Médiation des Entreprises service of the French Ministry of the Economy and Finance and Recovery.

In 2023, as part of its Responsible Purchasing approach, the Purchasing Department undertook a CSR mapping programme to identify the potential risks relating to human rights and social conditions in the domains of:

- ◆ **Forced labour and modern slavery**
- ◆ **Child labour**
- ◆ **Health and safety**
- ◆ **Discrimination**
- ◆ **Working conditions and trade union freedom**

## D. BUSINESS PARTNERS

The FDJ Group promotes **respect for fundamental human rights in its relations with its business partners, by insisting that its contracts with said partners** include the prohibition to sell lottery tickets and similar wagers to minors, even to emancipated minors. The Group also provides its partners with training media, in particular regarding sales to minors and the prevention of problem gambling and offers them support and awareness raising programmes in the fields of accessibility and disability, together with equipment providing easier accessibility for consumers.

## E. SPONSORING AND PARTNERSHIPS

**FDJ is a historic partner of French sport and has always taken a proactive approach to the role of sport in society and the values that it represents.**

◆ **The Group has  
for many years  
been involved in  
the promotion of sport  
as a positive lever  
for the transformation of society.** ◆

From the outset, the Group considered that sport is an asset that must be protected. Today sport has become an expression of the Group's corporate social responsibility. In practical terms, this responsibility is reflected in original partnerships structured around three pillars: beyond the "classic" marketing return on investment, the commitment of the Group is systematically expressed in the promotion of gender equality and the preservation of integrity in sport (campaigns against doping and match fixing).

Upstream, before signing any formal partnership, a risk analysis is conducted involving several different departments (Compliance, Purchasing, Integrity etc.) to ensure that the prospective partner respects human rights.

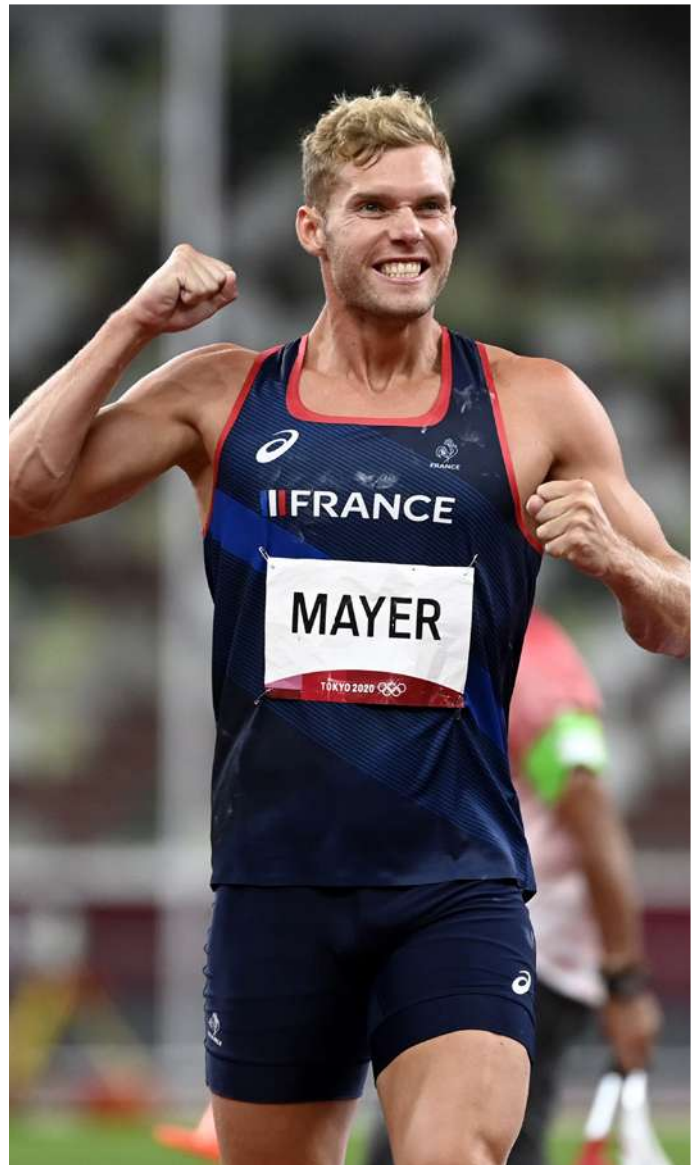
## F. INTEGRITY IN SPORT

Fairness in sport is a core concern of FDJ.

◆ **Active engagement and commitment against corruption in sport and against match fixing are recurrent features of the various awareness raising campaigns developed by the Group.** ◆

For example, the FDJ Group has launched awareness and prevention campaigns aimed at persons involved in sport (young people, coaching staff, professional federations etc.). FDJ is a member of the French national platform against the manipulation of competitions and is also one of the Founding Members (and member of the Executive Committee) of ULIS (United Lotteries for Integrity in Sports), where problems of integrity in sport are debated and solved.

In addition, the online betting activities of FDJ are supported by a permanent bet monitoring system (in the event of an atypical situation, an alert is reported in real time and can trigger an analysis). Moreover, the Group has developed the "Signale!" whistleblowing system in conjunction with the French Sports Ministry and the French Football Federation.



## G. DATA PROTECTION

The FDJ undertakes to supervise the protection of personal data and to apply the data protection rules stipulated in the GDPR.

A breach of personal data is a security breach that leads to the destruction, loss, alteration and/or unauthorized disclosure of transmitted personal data.

This concerns each category of stakeholder mentioned above, because the Group holds personal data concerning the stakeholders. For its employees, the Group draws up a Privacy Charter and provides training in the protection of personal data.

For all stakeholders, the Group's information security management system (ISMS) is certified in conformity with ISO 27001. With cyber-crime on the rise and new threats constantly emerging, certification to ISO 27001 helps organizations become risk-aware and proactively identify and address weaknesses.

The FDJ Group is also certified in conformity with the World Lottery Association – Security Control Standard (WLA-SCS), enabling it to meet all generally accepted information security and quality practices, as well as specific requirements of the lotteries and sports betting industry.



## REMEDIAL ACTION AND CONTROL

TO SUPERVISE THE IMPLEMENTATION OF THIS HUMAN RIGHTS POLICY, THE FDJ GROUP HAS ESTABLISHED A MONITORING AND REPORTING SYSTEM AND A GOVERNANCE STRUCTURE DEDICATED TO ITS CORRECT APPLICATION.

### A. REPORTING MECHANISMS

**The FDJ Group provides all its employees, partners and concerned parties with reporting channels for reporting and processing any incident or suspected violation of human rights.**

#### **ETHICS WHISTLEBLOWING SYSTEM FOR EMPLOYEES:**

The FDJ Group provides all its employees with a whistleblowing platform called "FDJALERTE", enabling them to report any suspected discrimination, harassment and/or violation of the Group's internal code of conduct. This platform is made available by a service provider bound by an obligation to strict confidentiality. The platform is secure, easy to use and accessible 24/7 via computer, tablet or smartphone. The ethics whistleblowing platform is accessible at the following address: <https://report.whistleb.com/fr/fdj>

Reports can be submitted in several languages and can be anonymous. All whistleblowing reports are routed via this channel to the competent persons for analysis. Use of this platform confers the status of whistleblower to the person submitting the report. Whistleblowers cannot be targets of reprisal measures for submitting a report in conformity with the applicable laws. In the case of confirmed violations, punitive action may be taken.

The ethics whistleblowing platform operates in supplement to the counselling and dialogue services of the Group.

#### **WHISTLEBLOWING MECHANISM FOR EXTERNAL STAKEHOLDERS:**

The "FDJALERTE" platform is also accessible to all external stakeholders of the FDJ Group via the Group's official website. A strictly confidential mediation procedure, available via the FDJ Group website, is also provided to all suppliers. For this purpose, an internal mediator has been appointed to process the various reported grievances.

Candidates for employment with the Group have access to an FDJ email address for reporting any suspected violation of human rights.

Similarly, customers are provided with access to a customer service helpline for reporting any grievances by email, telephone or chatbot.

## B. GOVERNANCE

**This Human Rights Policy has been validated by the CEO of the FDJ Group.**

Implementation of the Policy is supervised by the CSR and Responsible Gaming Committee, which meets several times a year to verify that the Group promotes a responsible gaming model to the general public, to examine the Corporate Social Responsibility policy and to analyze the key concerns for the Group's business model.

Operational deployment of the Policy is ensured by a working group composed of the operational departments actively involved in the Group's human rights approach, namely the Legal, Diversity and Inclusion, Responsible Purchasing, Risks, Health & Safety and Human Resources departments of the Group. In addition, experts from specialized business units may be asked to provide specific contributions relating to their domain of expertise when needed.

## C. PROGRESS PLAN

The FDJ Group undertakes to establish continuous improvement processes to strengthen the Group's response to human rights challenges and to ensure annual progress monitoring of these processes.



# LEGAL NOTICE

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