



ethics charter

GROUP FDJ



summary



◆	Foreword by Stéphane Pallez	P.2
◆	Why an ethics charter ?	P.3
◆	Fundamental principles to guide our behaviour	P.6
◆	Compliance with laws and regulations	P.07
◆	Sharing a culture of integrity	P.09
◆	Respecting employees and stakeholders	P.11
◆	Engaging in a constructive dialogue with civil society	P.13
◆	For more information	P.16

Foreword by Stéphane Pallez



The FDJ Group is one of the world's leading actors in the gaming sector, offering a range of services to ensure that every day, everywhere in France and for the greatest number of people, is an opportunity. As such, FDJ employees are mobilised daily to multiply these "lucky days" and offer a game model oriented towards our customers, both entertaining and responsible.

This will is expressed through five corporate values :

- **Accountability**, a guarantee of everyone's confidence in our Group, which mobilises all our strengths around the requirements of integrity and transparency,
- **Commitment**, which guarantees our long-term performance by enabling us to act in a socially responsible, supportive and collaborative manner,
- **Proximity**, as we are always concerned by others, in an accessible, interactive and caring relationship,
- **Optimism**, which allows us to share a positive vision of life
- **Innovation**, which makes us live the present and build the future in a true pioneering spirit by developing our capacity for inventiveness and openness.

These values bring together all our employees and stakeholders around a common base, explained and shared, principles that involve behaviour and acts calling for discernment, exemplarity, integrity, responsibility, and transparency, in a word, to **ETHICS**.

The FDJ's General Management therefore proposed to the Board of Directors, which validated it, the FDJ Group's Ethics Charter.

This reference document affirms our Group's collective commitment to promoting these values and guides our behaviour in accordance with fundamental principles that are:

- **Compliance** with laws and regulations ;
- Sharing a **culture of integrity** ;
- **Respecting** our employees, our customers, our partners and external contacts;
- Engaging in a **constructive dialogue** with civil society

Our daily objective is therefore to maintain and strengthen this ethical culture, in order to support the Group's transformation, pursue its development and be worthy of the confidence placed in us by our customers, our partners, the public authorities and our various stakeholders.

Our values will live and will be strong if our daily behaviours meet this ethical requirement. This is why the FDJ Group's Ethics Charter applies to each and every one of us, wherever we are and whatever our position within the FDJ Group, up to and including the Board of Directors.

- We must always keep in mind that: the ethical principles set out in this charter are not optional, they must be respected,
- We must all set an example: the reputation of FDJ, the trust of all our stakeholders, rely on each of us,
- We are all assessed in our functions not only on what we do, but also on how we do it.

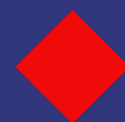
The Executive Committee and I therefore rely on all managers to ensure the diffusion of the Ethics Charter, and on each and every one of you to apply it faithfully in your day-to-day activities.

Stéphane PALLEZ

CEO - La Française des Jeux



Why an Ethics Charter?



◆ What is ethics in business? ◆

Ethics is a common approach, based on shared values, expressed through behaviours and actions that call for discernment, exemplarity and responsibility.

What is the Ethics Charter?

The present Ethics Charter does not replace national and international laws and regulations that apply to the Group's activities, nor to the various internal regulations of the FDJ Group.

The Ethics Charter reaffirms the commitment of the FDJ Group and its community of stakeholders to respect ethical principles. It allows, in compliance with the law and standards, to adapt our individual and collective behaviour to the values of the FDJ Group and meet the legitimate expectations of society.

Calling on the responsibility of each and every one of us, the Ethics Charter makes it possible to take, on an ethical level, the best possible decision in the exercise of our missions, the conduct of the Group's business and our relations with others.

Who is the Ethics Charter addressed to?

The Ethics Charter is the reference document for all managers and employees, permanent or temporary, of the FDJ Group, corporate officers and all our related parties: customers, suppliers, service providers and partners, administrators

Managers must:

- Refer regularly to the Ethics Charter in the presence of their team members to ensure that it is understood;
- Create a climate of trust that encourages employees to speak freely about their concerns;

- To show an exemplary conduct that embodies the values promoted by the Group;
- Ensure the proper application of the Ethics Charter and respect of its fundamental principles of action.

Each employee of the Group must be familiar with the Ethics Charter and should not hesitate to have it explained to them, and respect in their behaviour the principles of action that it sets out in accordance with the values promoted by the Group.

Suppliers, service providers and partners of the Group are required to refer to the content of the Ethics Charter and to apply standards at least equivalent to ours.

How to use this Ethics Charter?

Every employee must read the Ethics Charter and agree to comply with it.

To facilitate its understanding and implementation, the Ethics Charter is supplemented by the "Ethics in Practice" guide, a tool for decision support and risk prevention, which specifies the behaviours expected from the employees in accordance with FDJ Group commitments. This guide facilitates the understanding of ethical issues and makes it possible to pragmatically identify, even if it cannot foresee everything, at-risk situations through concrete questions and thus turn, if necessary, to the Group's qualified experts (direct manager, the Group Compliance and Anti-Corruption Officer, the Legal Department, the Human Resources Department, the Procurement Department, etc.):

- Is this action legal?
- Does it comply with the Ethics Charter, that is to say in accordance with our ethics principle and values?
- What would be the impact of this action on our stakeholders and could I justify my decision to my colleagues, my hierarchy?
- Would I be comfortable if my decision was made public internally and externally?

No document can predict or deal with all situations that may arise. In all cases, at the slightest difficulty in analysing a situation in terms of ethics or if this situation creates discomfort in you, the golden rule is to speak about any issue, with sincerity, with your hierarchy, the Human Resources department or the Group Compliance and Anti-Corruption Officer, who will help you in the decision and any follow-up.



Group Compliance and Anti-Corruption Officer

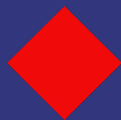
A dedicated function of Group Compliance and Anti-Corruption Officer exists within the Audit, Risks, Internal Control, Quality and Ethics department to ensure, in liaison with all the Group's entities:

- The definition and the implementation of the ethical scheme within the Group;
- The deployment of the charter and practical guides;
- The awareness of managers and employees and other related parties regarding the identified needs and risks, and related training;
- An operational support for all the difficulties encountered;
- Keeping the system up-to-date

The Group Compliance and Anti-Corruption Officer is there to ensure, at all times, an attentive listening, answer your questions, help you to respect our ethical commitments and duties, and support you, if necessary, in any complex situation.



Fundamental Principles to guide our behaviours



Responsibility, Commitment, Proximity, Optimism, Innovation are the corporate values promoted by the FDJ Group, which must take form daily in our professional activities.

This Ethics Charter affirms the collective commitment of our Group to promote these values and guide our behaviour in accordance with the following fundamental ethical principles :

1 **Compliance**
with laws
and regulations

2 Sharing a
**culture of
integrity**

3 **Respecting**
our employees,
our customers,
our partners and
external contacts

4 Engaging in a
**constructive
dialogue**
with civil society.

Managers play a major role in the FDJ Group's ethical scheme. It is up to them to transmit the values of the company and the principles of the Ethics Charter, and to ensure its promotion and respect on a daily basis.

They are supported by the Group Compliance and Anti-Corruption Officer, who provides them with support and method.





1

compliance **with laws and regulations**

The FDJ Group appeals to the sense of responsibility and honesty of each employee to comply with the national and international laws and regulations that apply to our activities.

Fraud and anti-money laundering legal and regulatory obligations, game addiction prevention and underage gambling prevention

We are aware of our mission as a gambling operator and the specific legal and regulatory requirements incumbent upon us.

In the fight against fraud and money laundering, to ensure strict compliance with our duty of care, we are permanently reinforcing our tools for the detection and treatment of anomalies related to gaming operations and physical and digital distribution networks.

In terms of prevention of excessive gambling and the prevention of underage gambling, we carry out, beyond our legal and regulatory obligations, a proactive policy, in particular, to accelerate the research on risky behaviours and to develop preventive actions, in particular through information and training.

In addition, like any commercial entity, we are also committed to the prevention of any criminal or inappropriate behaviour, including the prevention of corruption and other related crimes, data protection and compliance with competition law.

Refusal of all forms of fraud and corruption

Given the major changes in the regulatory framework of the fight against corruption in the conduct of business and the major strategic transformation of the Group, we have a dedicated prevention system adapted to this risk. We also share the vision of key actors in the fight against fraud, corruption and conflicts of interest, including Transparency International.

For several years, FDJ has been engaged in the prevention of sports corruption, with the highest-level French and European sports organisations and many sports federations. We conduct, on an ongoing basis, awareness campaigns to help fight against these abuses.

We follow the good practices defined by the Autorité des Marchés Financiers, supplemented by the specific fraud prevention guidelines issued by COSO (Committee of Sponsoring Organizations of the Treadway Commission).

Assets and data protection

The safety of our products, our infrastructures, efficiency of our processes and rigour of the control procedures are the guarantee of the integrity of our practices, our reputation and the sustainability of the Group.

Regarding the protection of our data, we meet the demanding standards of the WLA SCS and the ISO 27001 certification which guarantee the maintenance of the information security management system (ISMS).

Regarding the data protection of our customers and third parties, we firmly respect the regulatory obligations relating to the protection of personal data and we have the adequate skills and organisation to meet this objective.

Compliance with competition rules

Having a national monopoly on all lottery games and sports betting distributed through our physical network, we are also developing a betting offer in the competitive sector of online betting, and a range of services and products through our subsidiaries.

As such, we strictly respect the obligations set by competition law and consider our competitors with loyalty.



2

Sharing a

culture of integrity

The reputation of the FDJ Group is a key asset, a guarantee of its legitimacy and granted trust.

This reputation is based on our governance system, the transparency of our actions and decisions, as well as the behaviour of each and every one of us in the exercise of our missions and relations with others.

Therefore, integrity, loyalty, transparency are required qualities promoted to govern labour relations and the conduct of business.

Duty of loyalty

This obligation which imposes on our employees the fulfilment of their employment contract in good faith, is the basis of relations within the community of women and men that binds us professionally.

It implies, in particular, the respect of the commitments made, the recognition of the work of the other, the sincerity and completeness of the information relayed and, if necessary, their confidentiality.

Duty of exemplarity

Our managers have specific responsibilities towards their employees, and they must ensure that they are supervised and valued on the basis of recognition, competence and human respect.

They are supported by the Department of Human Relations and Transformation, which contributes to their development through the principles of managerial action.

Prevention of conflicts of interest

The FDJ Group analyses and deals with conflicts of interest situations without any complacency, aware that these ethical violations can generate serious reputation risks.

A dedicated guide is available to everyone to help anticipate this type of risk and adopt preventive measures if necessary by declaring a conflict of interest or even voluntarily withdrawing from a decision-making process or operation.

It is in this sense that we apply, on our website :

www.enligne.parionssport.fdj.fr and in our physical network, the legal and regulatory betting prohibitions imposed on employees, corporate officers and directors of the FDJ.

We also forbid ourselves to develop a sports betting offer on competitions in which a participating team is directly linked to FDJ.

Gifts and invitations

Exchanging gifts, invitations, and other facilities with outside partners or winners can:

- Interfere with the objectivity, judgment and ability of employees to carry out their duties and violate their duty of loyalty;
- Be related to or engage in corrupt practices and thereby seriously interfere with business conduct rules.

The exchange of gifts, invitations, and other facilities may help to strengthen relations between partners, but must be limited to courtesies corresponding to the most reasonable uses of authorised practices, within the limits of the legislation of the country concerned, and carried out in full transparency.

A dedicated guide is available to each individual to help them anticipate the risk and make the best decision in all circumstances.

Lobbying

Lobbying activities developed in the interest of our activities meet the requirements of integrity and transparency promoted by the Group. As such, we are signatories of the joint declaration of Transparency International France's member companies on lobbying.



3

respecting employees and stakeholders

Beyond its regulatory obligations, the FDJ Group is convinced that its sustainability relies on the confidence of its community of internal and external stakeholders, including employees, partners and suppliers, shareholders, customers and all other related parties.

Respecting employees

We guarantee our employees a healthy and safe working environment, in particular, respect for people, the protection of health and the safety of their activities. As such, FDJ holds the Diversity label and is OHSAS 18001 certified, an international reference for health and safety management.

We are also committed to the development of their professional qualities and responsibilities and place the necessary trust in them to achieve their goals and professional fulfilment.

We are deeply committed to the principle of equal opportunities, which benefits all employees and candidates within the FDJ Group. This principle is guaranteed by an employment policy based on the development of professional excellence, respecting diversity with competent and motivated women and men.

We recognize to all of our employees the right to organise themselves in accordance with the law, respect the free expression of employee representation bodies and advocate a respectful and quality social dialogue. We respect the privacy and confidentiality of employee data and are determined to fight against all possible forms of discrimination and harassment.

Respecting customers

We offer a responsible and playful gaming model, meeting international standards, through a diversified network, in strict compliance with legislation and safety and environmental standards:

- By ensuring that minors are protected and prevent excessive behaviour from our customers which may harm their interests and health;
- By offering our customers attentive and professional listening;
- By ensuring the confidentiality of their personal data.

With regard to the "jackpot winners", we must ensure strict confidentiality regarding the amounts won and scrupulously respect their anonymity whenever they wish. In addition, we support them by providing dedicated training programmes and a personalised follow-up.

Respecting the distribution network

Made up of competent, dynamic and committed women and men, our distribution network plays a key role in the success of our extensive gaming model.

The Group has long been involved, through its network, in the maintenance of local commerce and values its activities in its role as a player in the economic and social life of our territories.

Respecting suppliers and partners

The choice of our partners and suppliers imposes a particular rigour in the consultation and selection process that meets objective and transparent criteria. This prerequisite is the necessary precondition for building trusting relationships based on the respect of contractual commitments and the sharing of values and good practices.

As such, FDJ is a signatory of the "Responsible Supplier Relations" charter which promotes the implementation of a balanced and sustainable relationship between companies and suppliers.

Respecting shareholders

We strive to earn the trust of our shareholders and uphold high standards of corporate governance and transparency.

The corporate officers and directors of the FDJ Group strive to provide them with transparent, intelligible, relevant and reliable information.



4

Engaging in a
constructive
dialogue
with civil society

As a reference operator, the FDJ Group is aware of its responsibilities towards civil society, in particular, consumer associations, non-governmental actors responsible for the prevention of excessive gambling and the protection of minors. Thus, we are committed, beyond our legal and regulatory obligations, to promote, with our stakeholders, a continuous process of progress and dialogue.

Corporate social and environmental responsibility

The FDJ Group conducts with determination, and over time, a Societal and Environmental Responsibility policy in compliance with the commitments of the ISO 26000 standard by promoting Responsible Gaming, supporting causes of general interest and contributing to the preservation of the environment.

We recognize Integrity as the first principle of Corporate Governance and implement an ambitious, innovative and responsible Human Resources policy. We place our players at the heart of our development policy.

Dialogue, listening and transparency

Aware of the stakes and risks associated with our business, we maintain relationships of respect and trust with our stakeholders and work to develop best practices in our sector of activity.

We support structure for people at risk as well as academic research to ensure we have the knowledge, structured and validated by independent experts, on all societal issues that concern us and share it with our stakeholders in full transparency.

We are also proud to carry out philanthropic actions. Through the FDJ Corporate Foundation, we encourage, in particular, excelling oneself in and through sports, we promote social reintegration and mobilise the general public around this commitment of solidarity.

We are deeply committed in promoting the highest standards of responsible and recreational gaming, based on respectful, permanent and constructive reflection and dialogue.

For more information

The Ethics Charter is available :



- on the website www.groupefdj.com and on the intranet of every subsidiaries ;
- in French and English.

If you encounter difficulties, do not hesitate to contact :

- Your manager ;
- The Group Compliance and Anti-Corruption Officer: conformite.ac@lfdj.com ;
- The Director of Group Human Resources : pmargouarch@lfdj.com

Legal information

document by :

La Française des Jeux,

Société Anonyme d'Économie Mixte,

au capital de 76 400 000 euros,

immatriculée au RCS de Nanterre

sous le numéro 315.065.292

dont le siège social est situé 3-7 Quai du Point du jour,

92100 Boulogne-Billancourt.