

# ETHICS CHARTER

2026



**FDJ UNITED** 

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# A word from Stéphane Pallez



At FDJ UNITED, **responsibility** is central to everything we do. This essential value guides all our actions, especially in ethics and compliance.

As a European Group, being ethical primarily means **ensuring all our operations comply with current laws and regulations**, wherever we operate.

Ethics also represents a shared culture and strong values that guide our interactions with all stakeholders: our employees, suppliers, and civil society as a whole.

This is why we've compiled the principles underpinning our collective commitment within this Charter. Every FDJ UNITED employee, regardless of their role or entity, plays a crucial part in protecting **our Group's reputation**.

Ultimately, our strength, whether in France, Spain, Ireland or Sweden, lies in our shared culture of trust, fairness, and responsibility.

Thank you for your commitment.

**Stéphane Pallez,**  
Chairwoman & CEO

# Our profile

At FDJ UNITED, ethics and compliance are at the core of how we do business. They guide our decisions and shape our relationships. They help us meet our responsibilities with integrity, transparency, and respect for the law.

Our plural requirements are reflected throughout our Ethics Charter:



The **Ethics Charter** serves as the “umbrella document” for ethics and compliance. It brings together all codes, policies, and procedures needed to run an effective ethics and compliance program within FDJ UNITED.

It provides an overview of **FDJ UNITED commitments** and makes it easy for everyone to find more detailed guidance on each topic.

# Our Ethics Charter

## WHY AN ETHICS CHARTER?

Our Ethics Charter is a practical guide that reflects our purpose and values. It helps us make the right choices and act with integrity in our daily work to:

- ◆ Promote responsible business practices and set clear expectations for all employees and partners acting on our behalf.
- ◆ Connect you to other policies and detailed guidance\*.
- ◆ Know how to report concerns or violations, enabling everyone to raise issues safely and responsibly.

\* In case of conflict between this Ethics Charter and local laws or policies, the stricter or more protective standard shall apply.

## WHO IS CONCERNED?

This Charter applies to **all individuals working for the Group**, regardless of location, hierarchical level, type of contract, or length of employment.

This includes, for example: directors, members of the Executive Committee, permanent employees, interns, consultants, temporary workers, and others.

### As an employee, I must:

- ◆ Know, understand and follow the rules of this Charter and of the policies and procedures that apply to me.
- ◆ Attend training courses on ethics and compliance.
- ◆ Be vigilant daily to prevent any breach of our principles of integrity.
- ◆ Promote our social, societal, and environmental commitments in my activities and interactions on behalf of FDJ UNITED.
- ◆ Report any doubts or situations that go against our principles.

**Managers must lead by example**, promote understanding of the Ethics Charter, foster a culture of trust and encourage open conversations about ethics.



*This Charter also applies to our suppliers, service providers and partners. Their actions may impact us, and we require them to apply standards that are at least as high as ours.*

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# SUPPORT



# RESPONSIBLE GAMING

# WE PROMOTE RESPONSIBLE GAMING

We comply with gaming regulations in every country where we operate. Our games and services can affect vulnerable groups, especially underage people and those with problem gaming. We must act with rigor and vigilance.

## OUR PRINCIPLES OF ACTIONS

### WE MUST

- ◆ Watch for signs of risky behaviour, like frequent play or worrying comments.
- ◆ Avoid content that could appeal to minors.
- ◆ Ensure the ban on underage gaming is respected, particularly in retail points.
- ◆ Help our commercial partners detect risky behaviours.
- ◆ Encourage players to use tools like self-assessment tests and limit-setting options.
- ◆ Participate in responsible gaming training.

**By working together and staying alert, we help create a safe and fair gaming environment for everyone.**



# WE FIGHT AGAINST SPORT MANIPULATION

**FDJ UNITED is fully committed to protecting its integrity by combating all forms of competition manipulation. Our goal is to guarantee fair and transparent play for all participants in the sport.**

## OUR PRINCIPLES OF ACTIONS

### WE MUST

- ◆ Report any suspicious betting behaviour or manipulation risks.
- ◆ Promote fair play and integrity in all our sports-related actions.
- ◆ Support efforts to raise awareness about manipulation and doping.

**Everyone's vigilance and commitment are essential to preserving the integrity of sport and effectively combating all forms of manipulation.**



# RESPECT



# INDIVIDUALS

# WE RESPECT HUMAN RIGHTS

We respect all internationally recognized fundamental human rights and take measures to prevent or remedy adverse impacts in our activities and value chain. We must stay alert and lead by example, every day.

## OUR PRINCIPLES OF ACTIONS

### WE MUST

- ◆ Ensure that all our suppliers adhere to our Human Rights Policy and sign our Supplier CSR Commitment Charter.
- ◆ Treat everyone with respect.
- ◆ Report any behaviour or situation that could breach human rights.
- ◆ Ensure our products and services respect human rights.

**We observe human rights strictly to ensure fairness and dignity in everything we do.**

# WE PROTECT PEOPLE'S WELL-BEING

We are committed to ensure a safe, healthy, and supportive workplace where everyone can thrive with dignity. It is our responsibility to prevent risks, take care of each other, and help create a caring and supportive atmosphere.

## OUR PRINCIPLES OF ACTIONS

### WE MUST

- ◆ Respect boundaries to support a healthy work-life balance.
- ◆ Adjust our posture and equipment to prevent physical strain.
- ◆ Apply safety instructions and procedures.
- ◆ Make our workplaces and services accessible to all.
- ◆ Support colleagues who may need help or a listening ear.
- ◆ Respect the right to collective bargaining and social dialogue.

**We create a dignified and ethical working environment where everyone can flourish.**

# WE SUPPORT DIVERSITY, EQUALITY AND INCLUSION

Because inclusion is a strength, we are committed, as a company and as individuals, to building a fair and respectful workplace where everyone can thrive.

## OUR PRINCIPLES OF ACTIONS

### WE MUST

- ◆ Welcome everyone with respect, regardless of background, gender, sexual orientation, age, or disability.
- ◆ Stay informed by taking part in diversity and inclusion training.
- ◆ Offer equal access to training, projects, and career opportunities.
- ◆ Avoid comments or behaviours that exclude.
- ◆ Report any discrimination or harassment we witness or experience.
- ◆ Make our work practices more inclusive, covering digital and physical accessibility.

**Whatever our role, we all contribute to an inclusive workplace where everyone can thrive.**

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**ACT**



**WITH INTEGRITY**

# WE MAINTAIN RELATIONSHIPS OF TRUST WITH OUR STAKEHOLDERS

We must act with integrity, fairness and transparency in all our interactions with our stakeholders. We are committed to building responsible and sustainable relationships that reflect our values.

## OUR PRINCIPLES OF ACTIONS

### WE MUST

- ◆ Check the integrity of our stakeholders.
- ◆ Respect agreed payment terms.
- ◆ Provide tailored support to big prize-winners.
- ◆ Support our partner retailers, helping them grow their business and promote responsible gaming.
- ◆ Be transparent in budgets, invoices, and financial reports.
- ◆ Use clear and honest language in communications.

**We build long-lasting, responsible business relationships based on trust and integrity that align with our values.**

# WE COMPLY WITH INTERNATIONAL TRADE RULES AND TAX OBLIGATIONS

**We promote fair competition wherever we operate  
and comply with trade and tax regulations.**

**We refuse business with sanctioned partners  
and adhere to the rules of regulated markets.**

## OUR PRINCIPLES OF ACTIONS

### WE MUST

- ◆ Verify that our partners are not on sanction lists.
- ◆ Not share confidential information with competitors.
- ◆ Never misuse our market position to get unfair advantages.
- ◆ Keep our activities under exclusive rights separate from those in competition.
- ◆ Keep ourselves updated on competition rules through regular training.

**By complying with international trade rules  
and tax obligations, we promote fair competition  
and preserve the integrity of our activities.**

# WE FIGHT CORRUPTION

We adopt a zero-tolerance approach to corruption and act with transparency and vigilance in all professional relationships. We must act responsibly and uphold our integrity in every situation.

## OUR PRINCIPLES OF ACTIONS

### WE MUST

- ◆ Implement the rules of the Anti-Corruption Code of Conduct in our day-to-day activities.
- ◆ Stay alert when making decisions or interacting with high-risk third parties.
- ◆ Handle gifts and invitations with care, and refuse those that exceed simple courtesy to prevent any risk.
- ◆ Declare any conflict of interest, even potential ones.
- ◆ Speak up if we see anything suspicious, such as fraud, undue advantage, or conflict of interest.

**Vigilance and rigour in our decisions and professional relationships are essential to prevent any form of corruption.**

# WE FIGHT FRAUD AND MONEY LAUNDERING

We actively combat fraud and money laundering by applying rigorous controls to ensure the integrity of our games and services and the security of our players and our company.

## OUR PRINCIPLES OF ACTIONS

### WE MUST

- ◆ Be aware of the risks to which we are exposed, including those from within, anticipate and remain vigilant.
- ◆ Exercise constant vigilance, identify and report anything suspicious, such as:
  - inconsistent data or behaviour that deviates significantly from standard practices,
  - sudden changes in customer profiles,
  - unusual gaming activity,
  - high frequency of transactions,
  - large amounts of transactions.
- ◆ Be proactive and cooperate fully with the authorities.

**Being rigorous and vigilant is essential to prevent the risks of fraud and money laundering. This allows us to protect our players and guarantee the integrity of our games and services.**

# WE PROTECT PERSONAL DATA AND OUR ASSETS

Because we handle personal data, FDJ UNITED is committed to protecting this information and ensuring the security of its systems. This daily responsibility requires vigilance, technical rigor, and respect for everyone's rights.



## OUR PRINCIPLES OF ACTIONS FOR PERSONAL DATA

### WE MUST

- ◆ Protect personal information of customers, colleagues, and partners with appropriate security measures.
- ◆ Apply the security rules of the WLA SCS and ISO 27001 standards to protect our data and operations.
- ◆ Train our teams to uphold data protection standards.

**The protection of personal data relies on our daily vigilance and strict compliance with security rules.**

# WE PROTECT PERSONAL DATA AND OUR ASSETS

Because we handle highly sensitive and personal data, FDJ UNITED is committed to protecting this information and ensuring the security of its systems. This daily responsibility requires vigilance, technical rigor, and respect for everyone's rights.

## OUR PRINCIPLES OF ACTIONS FOR CYBERSECURITY

### WE MUST

- ◆ Stay alert to suspicious emails or calls asking for personal information (phishing).
- ◆ Report any data breach, leak, or suspicious activity related to IT or security.
- ◆ Adhere to cybersecurity best practices, such as using strong passwords and keeping software up to date.

**By staying vigilant and following these practices, we help safeguard the security of the entire organization.**

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# MAKE A POSITIVE CONTRIBUTION



# TO SOCIETY AND THE ENVIRONMENT

# WE USE NEW TECHNOLOGIES RESPONSIBLY

At FDJ UNITED, new technologies are a key driver for innovation, improving our services and strengthening trust. We use them responsibly and ethically, placing security, transparency and respect for individuals at the heart of their use.

## OUR PRINCIPLES OF ACTIONS

### WE MUST

- ◆ Use only trusted, approved, and safe IT and AI tools at work.
- ◆ Prioritize low water, energy and minerals-consuming IT tools.
- ◆ Use AI, when necessary, to support our roles, never to replace them, and always review and validate its results.
- ◆ Ensure new technology biases are addressed when developing tools and applications.
- ◆ Avoid sharing any sensitive information with AI.
- ◆ Use social media in a clear, respectful, and responsible manner.

**Acting responsibly with new technologies is essential to foster innovation while protecting people, data, and trust in our services.**



# WE PRESERVE OUR PLANET

Preserving the planet is not an option, it's a commitment. Every action counts to reduce our carbon footprint and protect the ecosystems we depend on.

## OUR PRINCIPLES OF ACTIONS

### WE MUST

- ◆ Reduce our carbon footprint in line with the 1.5 °C target.
- ◆ Restore and protect ecosystems impacted by our activities.
- ◆ Adopt clear-sighted habits: cut paper waste, sort and recycle efficiently.
- ◆ Choose suppliers who meet environmental standards, such as complying with international standards and local regulations and adopting responsible practices.
- ◆ Take part in climate and biodiversity actions and trainings and apply what we learn in our daily work.

**Whatever our role, we all contribute to a greener FDJ UNITED.**



# WE SERVE THE COMMON GOOD THROUGH OUR FOUNDATION

The FDJ UNITED Foundation is committed to promote equal opportunities in France. It supports projects of general interest, aimed at people in difficulty: economic, social and cultural disadvantage, disability, etc.

## OUR PRINCIPLES OF ACTIONS

### WE MUST

- ◆ Promote equal opportunities for all.
- ◆ Support projects aiding education and social inclusion.
- ◆ Encourage impactful local initiatives.
- ◆ Build trust through collaboration with partners.
- ◆ Share and support the Foundation's values and mission.

**The FDJ UNITED Foundation embodies our commitment to promoting equal opportunities and supporting concrete actions that serve the common good.**



# OUR



# RESPONSIBILITIES

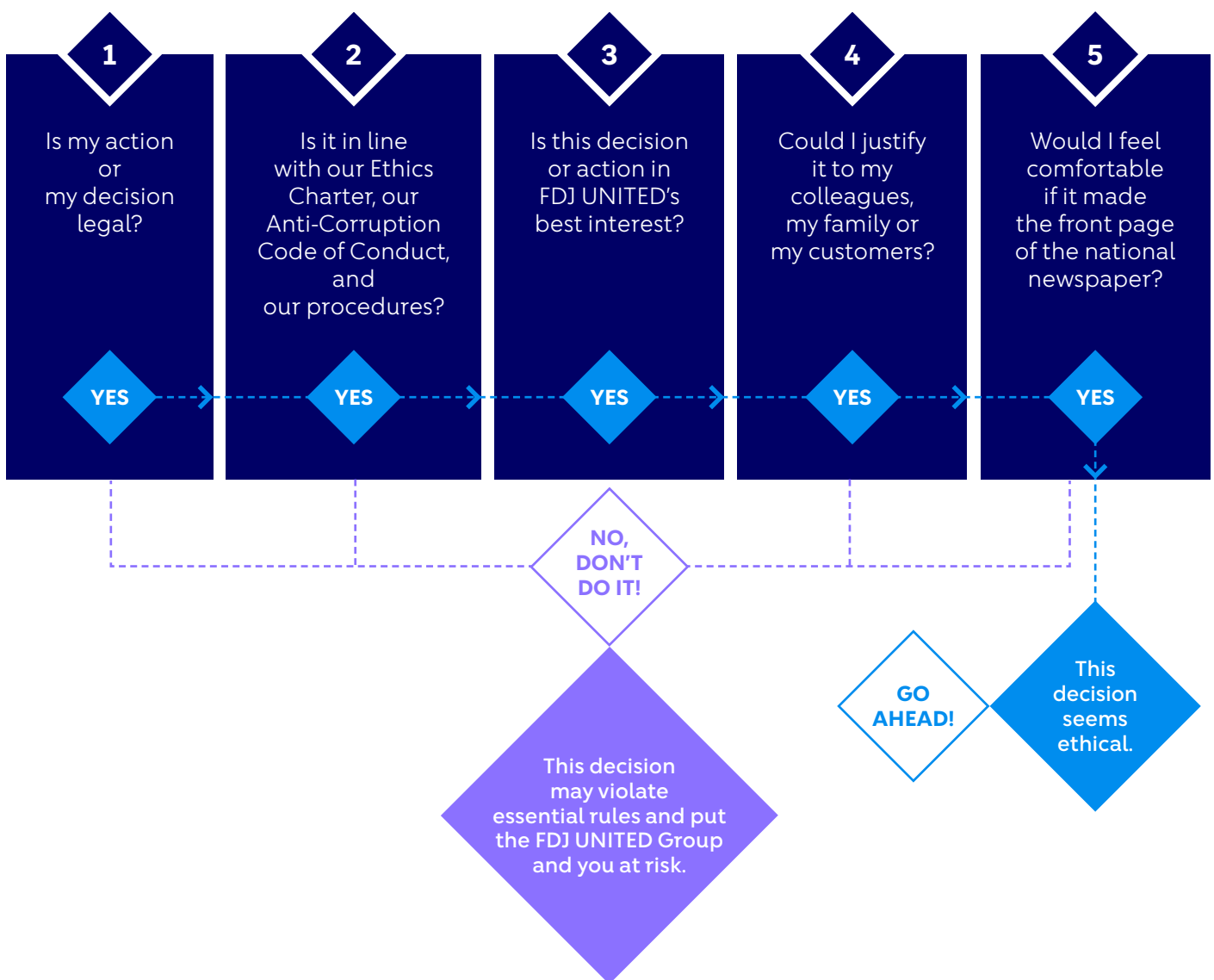
# Acting ethically every day

**Ethics means taking time to think about our decisions and questioning our habits. We should use good judgment in our decisions every day.**

This Charter is a guide to help you act ethically every day. However, we cannot cover every action that you must adhere to.

Refer to the ethical decision tree to determine the right approach to take in accordance with this Charter, our policies, and our ethical principles.

**Before making a decision or acting, ask yourself these questions:**



**In case of doubt, seek advice from:**

- The Ethics & Anti-Corruption team: [conformite.ac@lfdj.com](mailto:conformite.ac@lfdj.com)
- Your manager
- Or the Human Resources department

# Reporting unethical behaviour

**If you encounter a suspicious situation or a violation of the law, regulations, or principles of this Charter, you can report it through FDJ UNITED ALERT.**

FDJ UNITED ALERT is an external, independent, and entirely secure alert platform. The **Ethics & Anti-Corruption team** ensures that all alerts are handled independently, objectively, and impartially, in full compliance with the European Directive and our internal procedures.

The FDJ UNITED ALERT is available to:

- ◆ All employees of FDJ UNITED, regardless of their status, entity, or country;
- ◆ Our external stakeholders (service providers, former employees, candidates, etc.).

It allows you to confidently **report any situation** that violates\*:

- ◆ The law;
- ◆ Our ethical principles (potential act of fraud, money laundering, breach of data privacy, etc.);
- ◆ Our Anti-Corruption Code of Conduct (potential act of corruption, conflict of interest, etc.);
- ◆ A situation of discrimination, harassment, health and well-being at work, etc.

## How to report an incident?



### Use the online platform:

<https://fdjunited.integrityline.fr/>

This platform is:

- Secure
- Accessible 24/7
- Available in French and English



### Discuss it with:

- The Ethics & Anti-Corruption team : [conformite.ac@fdj.com](mailto:conformite.ac@fdj.com)
- Your manager
- The Anti-Corruption contacts
- The Human Resources department



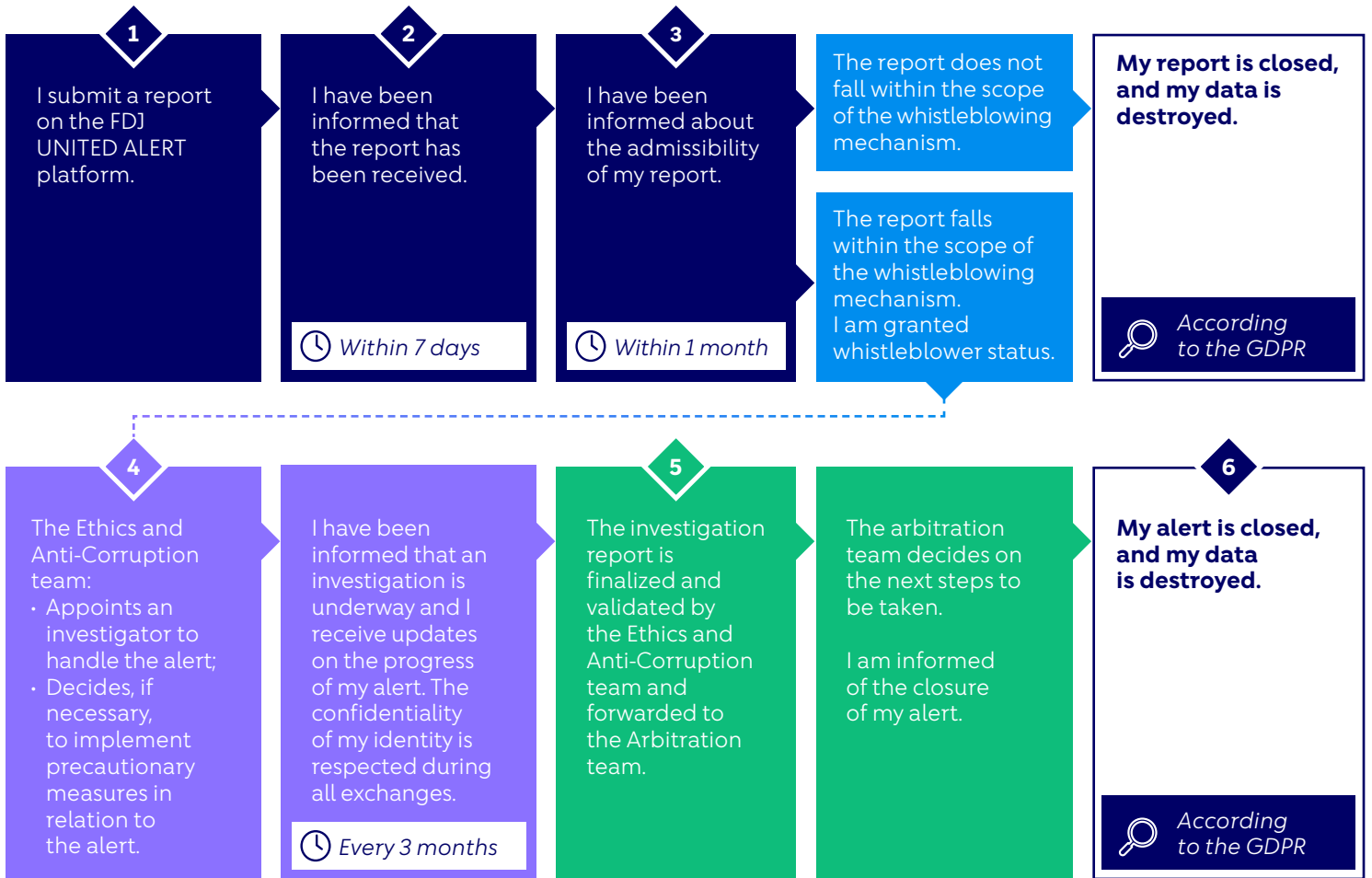
Use the channel that best suits your need. The people in charge will handle your report with confidentiality, impartiality, and independence.

In line with the European Directive reinforcing the protection of whistleblower (Directive (UE) 2019/1937), you may also choose to raise your concern with the competent external authorities.

\*non-exhaustive list.

# What happens once a report has been made?

## THE ALERT PATH



### YOU ARE PROTECTED

#### The ethics alert system guarantees:

- ◆ The **confidentiality** of your report;
- ◆ The **safeguarding of your personal data**;
- ◆ The **preservation of your identity**;
- ◆ The **protection against retaliation** if you raise a concern in good faith without receiving any direct financial compensation.

You may submit a report **anonymously**, but identifying yourself often allows for more efficient handling.

This protection also extends to **facilitators**. Facilitators are those who have helped the reporter submit the report, such as a manager, union representative, or NGO. It also covers individuals or legal entities connected to the reporter who might suffer retaliation.

# FDJ UNITED

## **FDJ UNITED HEADQUARTERS**

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