

# Responsible communication charter

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# A charter

unlike any other

This charter sets out our vision of respect for the world around us, our environment as well as **players, partner retailers, employees and service providers.**

For us, gaming is a universal social activity that is as old as time. For ninety years, we have been supporting French citizens, whether they play or not, by building a business that is fun, responsible and socially useful. For over twenty years, we have been striving to do our utmost to promote honest, recreational gaming in the interests of our players, building a **lasting relationship based on trust.**

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

The societal and environmental impact of our brand matters very much to us.

Through this responsible communication charter we are aiming to put ourselves under the microscope. To be better. It's about more than just words: in order to be a truly sustainable brand, **we want everyone involved in producing and circulating our communications to make a commitment to uphold our ethical standards and this charter.**

# A charter

to do good!

◆ **FOR ALL COMMUNICATORS**

Employees, external agencies, service providers, etc.

◆ **FOR ALL ISSUERS**

FDJ Group, FDJ, one of our product brands (illiko®, Parions Sport En Ligne, Parions Sport Point de Vente, EuroMillions – My Million, LOTO®, etc.), or one of our subsidiaries

◆ **FOR ALL TOUCH POINTS**

Digital, mass media, CRM, point of sale, sponsorship, event, social media, etc.

◆ **FOR ALL MEDIA**

Animated banner, TV/radio commercial, print ad, display, goodies, video, newsletter, stadium billboards, etc.

◆ **FOR ALL TARGETS**

Players, stakeholders from the network (partner retailers, sales force, etc.), employees, opinion leaders, etc.

◆ **FOR ALL COUNTRIES**

In France and internationally

**We want every employee and every consumer TO BE PROUD OF OUR FDJ BRAND.**

# 01 Responsible design

## I WILL

- ◆ **Communicate clearly, truthfully and sincerely**, particularly with regard to players' chances of winning and the amounts they may hope to win.
- ◆ **Not design ads featuring settings or situations related to borrowing money.**
- ◆ **Ensure that the use of offers involving financial rewards to players and direct marketing** is not excessive, and that marketing communications are suited to the risk levels of the games being promoted.
- ◆ **Consult the FDJ Group's brand book and follow its corporate style guide** to ensure a consistent brand image across all media.



## A. Ethical conduct

### I WILL

- ◆ **Depict society**, individuals and their behaviour **as accurately and realistically as possible, avoiding caricatures.**
- ◆ **Not violate human dignity.**
- ◆ **Not exploit feelings of fear or suffering.**
- ◆ **Not condone rude, violent or unlawful behaviour.**
- ◆ **Not condone behaviour or depictions that go against the principles of environmental protection** and the preservation of natural resources.
- ◆ **Refrain from any depictions that go against the Sustainable Development Goals (SDGs).**
- ◆ **Not condone any type of excessive gambling behaviour** that could jeopardise the player's financial, social or psychological well-being.
- ◆ **Not give the impression that excessive gambling losses might not have consequences** on the player's life.
- ◆ **Not denigrate non-player groups.**
- ◆ **Not associate social superiority** with players.

## A. Ethical conduct (cont.)

### I WILL

- ◆ **Not depict situations involving repetitive, uncontrolled or compulsive gambling**, or situations in which players could bet excessive amounts.
- ◆ **Not associate gaming with great accomplishments** or compare players to extreme athletes.
- ◆ **Not suggest that players systematically win**, nor that repetitive gambling will necessarily help them win, nor that increasing the frequency of gambling each time increases their chances of winning.
- ◆ **Not suggest that players' skills, expertise or experience will enable them to eliminate the element of chance** or uncertainty on which winning depends. The same goes for sports predictions, which may be based on expertise: advertising must not suggest that this expertise will enable players to win systematically.
- ◆ **Not devalue effort**, work or education in favour of gaming.
- ◆ **Not depict family or social relationships** as being secondary to gaming.
- ◆ **Not depict the player alone or in an isolated situation** (our player is sociable and has a good network).

## B. Promoting diversity

### I WILL

- ◆ **Promote gender equality**: As many women as men.
- ◆ **Promote diversity**: Diverse backgrounds and nationalities.
- ◆ **Promote physical diversity** (physical appearance): Do not exclude people with disabilities.
- ◆ **Combat common stereotypes** (refer to the stereotype grid on the Brand Centre).
- ◆ **Communicate without showing religious leanings**.
- ◆ **Not condone any form of discrimination**, including on the grounds of class, ethnicity, nationality, religion, gender, sexual orientation or age.
- ◆ **Depict the player/winner in a positive way** (physique, tone, behaviour).



## C. Standing firm on the ban on underage gambling

### I WILL

- ◆ **Not depict minors.**

*The FDJ Corporate Foundation is not bound by this commitment.*

- ◆ **Ensure that all actors chosen for the FDJ Group's advertisements are over the age of 25. The only exceptions** to this rule are **adult elite athletes** (members of a professional sports team, club or federation).

- ◆ **Refrain from all advertising that could be interpreted as suggesting that betting and gaming are normal recreational activities for minors** (or are engaged in by minors, even in a family setting).

- ◆ **Not portray betting games as gifts for children to give or receive.**

- ◆ **Include this logo reminding viewers that underage gambling is prohibited** in all marketing communications and games.



- ◆ **Not use any symbols or references (whether visual, aural, verbal or written) that are part of a young person's world** or may appeal to them in particular (fictional characters or real people; celebrities; books, music or films; objects; language and expressions, etc.) **when designing our communications.**

- ◆ **Not present betting as a sign of reaching adulthood.**

- ◆ **Not use the ban on underage gambling as an argument in advertising.**

## D. Positively depicting gaming and winning

### I WILL

- ◆ **Depict gaming as a recreational activity** (and not a way to make a living).

- ◆ **Not depict gaming as a driver of social success** (e.g. as a way to achieve romantic or sexual success, glory, power or the admiration of others, or with ostentatious, excessive signs of material wealth). I will also avoid a systematically materialistic depiction of money/winning (yacht, private jet, fine villa, etc.).

- ◆ **Make sure winning is depicted in a realistic way, proportional to the amount announced.**

- ◆ **Choose to depict winning in a way that is respectful of the environment** (avoid portraying things like big polluting cars and activities with an excessive environmental impact).

- ◆ **Not suggest that gaming is a way to solve financial problems** or recover gambling losses.

- ◆ **Not depict gaming as a solution** to personal, professional, social or psychological issues.

## E. Mandatory information and regulatory compliance

The ANJ's guidelines and recommendations should be consulted and applied (see following links [in French]):  
<https://anj.fr/lignes-directrices>  
<https://anj.fr/recommandations>

### I WILL

- ◆ Always include the official logo of the FDJ Group, FDJ or one of its sub-brands in my communications.
- ◆ If my content:
  - ◆ is sponsored by a betting brand in the FDJ Group's portfolio (FDJ, illiko®, LOTO®, etc.);
  - ◆ targets players, stakeholders from the network (partner retailers, sales force, etc.), or opinion leaders;
  - ◆ is made by an influencer or content creator and sponsored by the FDJ Group, FDJ or one of its sub-brands;

I must include a legible, visible warning message:



\*Betting and gaming can be dangerous and may cause problems such as financial losses, family disputes and addiction. Get help by visiting [joueurs-info-service.fr](http://joueurs-info-service.fr) or calling +33 (0)9 74 75 13 13 (Freephone number).

This warning must be positioned horizontally, in a dedicated space, separate from the promotional content, in yellow to contrast with the advertisement's background colour. It must include the French government logo on the right.

Regarding the warning message and how it should be integrated into advertisements, refer to the document entitled "New warning messages", which explains in detail the rules for including the message for each media type. This document is available on the FDJ Group's Brand Centre (<https://brandcenter-groupefdj.com>) under FDJ Group / Guidelines.

### For audiovisual media,

I must include the warning message using one of the following methods:

- ◆ In a fixed banner at the bottom of the screen, in a textbox with a yellow background and a minimum size of 7% of the page on which it appears. The message must not disappear while the ad is playing.



- ◆ Across the entire area of the communication medium for a period of three seconds, immediately following the ad, against a yellow background.



## E. Mandatory information and regulatory compliance (cont.)

### For print media,

I must include the warning message in a textbox with a yellow background and a minimum size of 7% of the page on which it appears.

The message must be fixed in place and permanently visible, without any changes to its content.



ET VOIR LA FRANCE GAGNER

LES JEUX D'ARGENT ET DE HASARD PEUVENT ÊTRE DANGEREUX : PERTES D'ARGENT, CONFLITS FAMILIAUX, ADDICTION... RETROUVEZ NOS CONSEILS SUR JOUEURS-INFO-SERVICE.FR (09 74 75 13 13 - APPEL NON SURTAXÉ)

### For radio broadcasts,

the following warning message must be played immediately after the advertisement:

**Betting and gaming can be dangerous and may cause problems such as financial losses, family disputes and addiction. Get help by visiting [joueurs-info-service.fr](http://joueurs-info-service.fr) or calling +33 (0)9 74 75 13 13 (Freephone number).**

### For digital media,

(all formats, including mailing, online videos, influencer marketing, etc.).

With the exception of VOD (video on demand), for which the TV message should be used.

**Note:** The regulatory requirements for digital communications have not yet been published.

Pending their release, I must alternate equally between the following 3 versions of the warning message, which must be clearly legible and visible, in a separate, clickable horizontal space that links to [www.joueurs-info-service.fr](http://www.joueurs-info-service.fr) (size not specified).

GAMING INVOLVES RISKS: DEBT, ADDICTION, ETC.  
CALL +33 (0)9 74 75 13 13 (FREEPHONE NUMBER).

GAMING INVOLVES RISKS: ISOLATION, DEBT, ETC.  
CALL +33 (0)9 74 75 13 13 (FREEPHONE NUMBER).

GAMING INVOLVES RISKS: ADDICTION, ISOLATION, ETC.  
CALL +33 (0)9 74 75 13 13 (FREEPHONE NUMBER).

### NB: The following are not bound by this commitment:

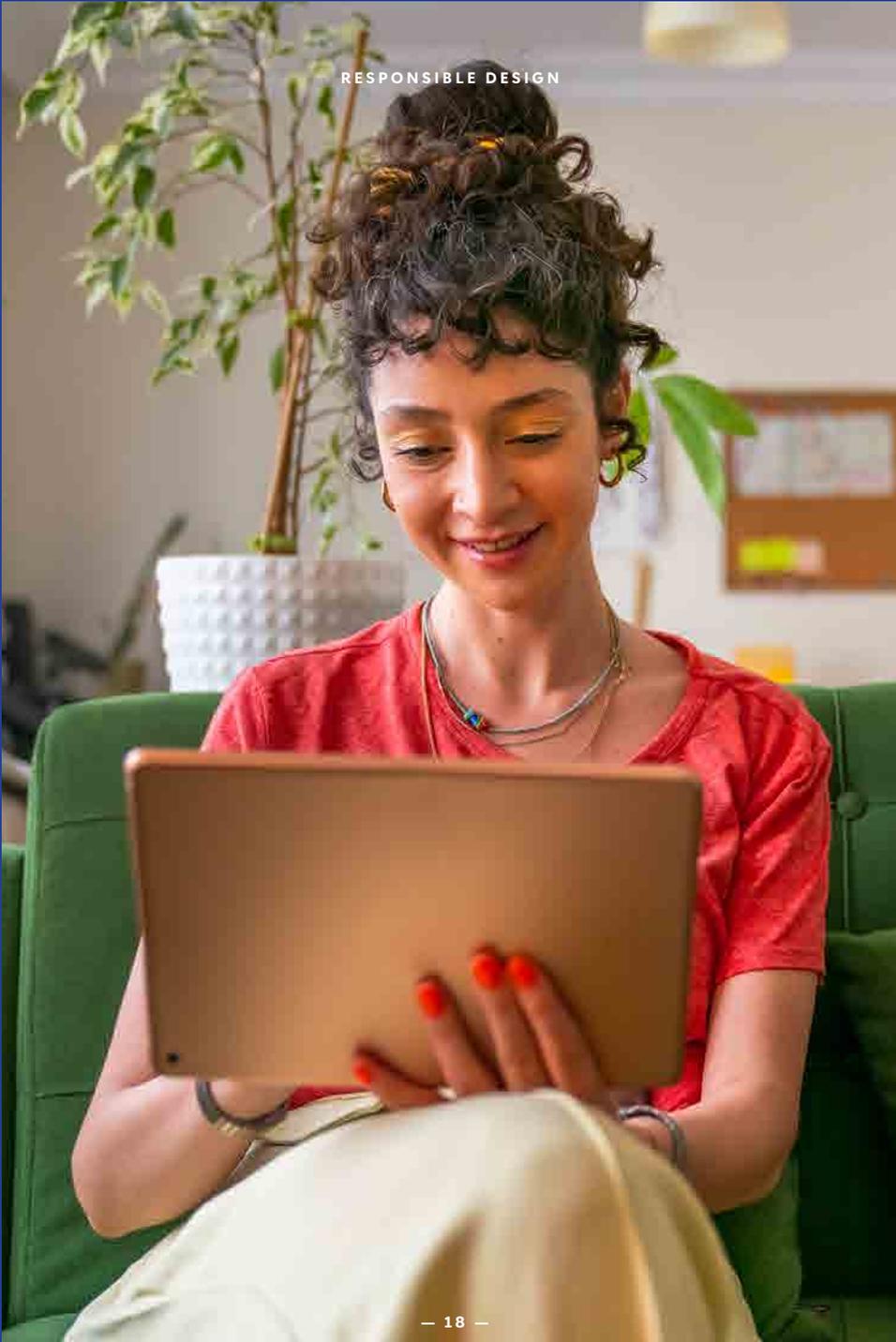
- ◆ In-house communications
- ◆ Communications by **gaming brands that do not involve betting, and which do not feature any of the betting brands** in our portfolio.

## E. Mandatory information and regulatory compliance (cont.)

### I WILL

- ◆ In my communications, **make it clear whether the message is an advertisement:**
  - ◆ **For print media**, use the official logo of the FDJ Group or one of its sub-brands, plus the Trade and Companies Register (RCS) number.
  - ◆ **If my content is an advertorial (advertising + editorial)**, include the message "Advertisement" or "Advertorial", as the case may be, at the top right-hand corner, in clearly legible text.
  - ◆ **Explicitly identify any communications made in collaboration with one or more influencers or content creators**, so that the audience clearly understands that the content is sponsored: this can be signalled by any means (in the content itself, in text accompanying the content, by means of a disclaimer in the video, etc.) as long as it is brought to the audience's attention, regardless of how the content is accessed.
- ◆ More specifically, regarding **influencer/digital marketing, I will:**
  - ◆ **Follow the rules of ethics** set out in this responsible communication charter, available on the FDJ Group's Brand Centre (<https://brandcenter-groupefdj.com>) under FDJ Group / Guidelines, and **check that partner agencies/influencers have fully understood these rules.**
  - ◆ **Include the warning messages** applicable for all betting games and their marketing materials (whether direct or via partners). See above.

- ◆ **In all new contracts** entered into with influencers, **include the obligation for their content to feature an explicit statement of the marketing nature of the material, the obligation to comply with current regulations**, in particular the ban on underage gambling, and the obligation to follow the French Advertising Standards Authority (ARPP)'s recommendation on betting.
- ◆ **Ensure that influencers/content creators are over the age of 25, with the exception of adult elite athletes** (members of a professional sports team, club or federation).
- ◆ **Not work with influencers for whom minors** (in the age range of 13-17) **make up 16% or more of their social media audience.**
- ◆ **Not work with influencers who offer paid picks services** or who exploit consumers' credulity, trust or lack of experience and knowledge.
- ◆ **Prefer influencers who have a responsible influencer marketing certificate** issued by the ARPP and its betting unit, and otherwise encourage influencers to obtain this certificate.
- ◆ **Not denigrate my direct or indirect competitors**, not copy them and only use truthful, objective and neutral information for any comparisons.
- ◆ For **electronic communications, ensure they can be closed easily.** Under no circumstances should symbols generally used to close an ad (e.g. an "X") have the opposite effect and open an ad when clicked on.
- ◆ For **electronic communications, ensure that the recipient can ask to no longer receive ads** from FDJ or its various commercial brands and subsidiaries.



## 02

## Responsible circulation

### I WILL

- ◆ **Include subtitles** if my content is a video/TV commercial.
- ◆ **Promote environmentally friendly processes through my recommendations:**
  - ◆ **For greenhouse gas emissions we are unable to reduce despite our action plan** (e.g. favouring eco-friendly or the lowest-emission modes of transport for advertising shoots, employee travel, etc.), insofar as **possible offset carbon emissions through voluntary schemes** (funding a project to reduce or capture greenhouse gas emissions for which we are not directly responsible).
  - ◆ **Always use FSC-certified paper** and, if possible, **fully recycled paper**, barring any technical constraints, and **have the associated logo** added by the printer.
  - ◆ **Encourage recycling of paper documents** by adding the Triman recycling logo (available to download from the ADEME website [in French]): <https://librairie.ademe.fr/dechets-economie-circulaire/2870-signalétique-commune-de-tri-triman-guide-d-utilisation.html>
  - ◆ For digital content, check whether **the data servers hosting our ads are powered by renewable energy** and, insofar as possible, request that this be the case.
- ◆ **Not advertise in controversial media.**

## RESPONSIBLE CIRCULATION

- ◆ **Not target my communications to minors, whether directly or indirectly:**
  - ◆ Do not include our communications in youth media or programmes targeting minors.
  - ◆ Be very careful about the places and spaces our communications are circulated (particularly those frequented by young people).
  - ◆ For digital content, I will not advertise in spaces requiring logins that do not allow for the exclusion of minors from targeted advertising. In spaces that do not require logins, I will adjust targeted advertising to avoid targeting display environments and fields of interest specific to minors; I will analyse large-scale campaigns after their completion to check whether these adjustments were effective.
- ◆ **Not direct marketing towards players identified as problem gamblers or pathological gamblers.**
- ◆ **Not target players using any keywords related to voluntarily blocking oneself from a gambling website, gambling bans or searches for information and support for combating addiction,** with the exception of targeting carried out in connection with campaigns to prevent problem gambling and underage gambling.
- ◆ **Not target players in settings or situations related to borrowing money,** wherever possible given the platform and technical tools available.
- ◆ **Approve the whitelist of sites before launching a digital campaign,** and use an ad verification tool to exclude sites or block advertising on sites featuring content aimed at minors and/or that could harm the brand's image and/or that of the responsible gaming policy (brand safety issues).
- ◆ **Keep the circulation of my communications under control** to limit excessive exposure and ensure that they are suited to their audience.
  - ◆ Wherever possible, depending on the digital media sales house's ad trafficking tools, **I will cap the visibility of campaigns at 3 views per day, per user, per medium and per device** (spaces requiring and not requiring logins).

## RESPONSIBLE CIRCULATION

- ◆ **In spaces not requiring logins, I will ask the service provider to certify compliance with this cap** and I will share the results of these checks at the annual Charter Monitoring Committee meeting.
- ◆ In spaces requiring logins, I will ask the platforms to certify compliance with this cap after the campaign has ended.
- ◆ **Favour user-friendly digital advertising formats** (IAB standard, skippable video formats, etc.) and encourage my service providers and the media selling advertising space to develop their use of such formats.
- ◆ **Ensure that my content is accessible to people with disabilities,** wherever possible (people with reduced mobility or hearing or visual disabilities).
- ◆ **Never use flyposting tactics on the street.**



- ◆ **Set aside 10% of the annual multimedia marketing budget (excluding performing campaigns) to support responsible gaming messages,** in order to share preventive information with our players.

# 03

## Data protection

### I WILL

- ◆ Ensure that players' and prize winners' personal data is kept **completely confidential**, and is only used transparently and with their consent.
- ◆ Educate consumers on the **collection and use of their personal data**.



# 04

## Balanced relations with our service providers and partners

### I WILL

- ◆ Through my behaviour, uphold the principles of action set out in the FDJ Group's ethics charter.
- ◆ Build relationships based on trust with my partners/suppliers, and be particularly attentive to the following issues:
  - ◆ Combating the financing of illegal activities through online advertising
  - ◆ Integrity, loyalty and mutual respect
  - ◆ Fair terms for suppliers (alignment with market prices and respecting payment terms), who must also respect this principle in their relations with their subcontractors/partners
  - ◆ Labour practices of service providers/partners (policy to promote well-being at work, HR practices, etc.)
  - ◆ Environmental practices of service providers/partners
  - ◆ Risks of mutual dependency between clients and service providers/partners
- ◆ Prioritise companies that specifically employ people with disabilities and local businesses wherever possible (in conjunction with the purchasing department).

# 05

## Following the sign-off process

### I WILL

#### ◆ For all:

- ◆ Abide by this charter

#### ◆ For internal use only:

- ◆ Send my communications to the following email addresses for sign-off:

**brand-management@lfdj.com**

**validationsdjur@lfdj.com**

**validationsjr@lfdj.com**

**validationsdirap@lfdj.com**

- ◆ For each communication campaign, the FDJ stereotype and eco-friendly behaviour grid must be filled in and sent to brand-management@lfdj.com

## Sources

- ◆ French Decree 2020-1349 of 4 November 2020
- ◆ French Order of 29 July 2022 – Warning message against problem or pathological gambling
- ◆ Guidelines issued by the Autorité Nationale des Jeux (French National Gaming Authority – ANJ) (Statement No. 2022-C-001 of 17 February 2022)
- ◆ Autorité de Régulation Professionnelle de la Publicité (French Advertising Standards Authority – ARPP) Recommendation on betting, 27 July 2022
- ◆ Institut National de Prévention et d'Éducation pour la Santé (French National Institute for Prevention and Health Education – INPES)
- ◆ Union des Marques (UDM) FAIRe programme

Everything you need to know about the FDJ Group's marketing, promotional and sponsorship materials is available on the FDJ Group's Brand Centre (<https://brandcenter-groupefdj.com>) under FDJ Group / Guidelines.

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FDJ Brand Strategy & Identity

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Rangoon

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