FDJ UNITED

RESPONSIBLE COMMUNICATION CHARTER

OCTOBER 2026 EDITION



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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 the people of France – players and non-players alike – by building a business that is fun, responsible and useful to society. 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.**

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

Through this Responsible Communication Charter, we aim to challenge ourselves and continuously improve. Beyond words, our ambition is to be a truly sustainable brand. It's about more than just words: **we want everyone involved in producing and circulating our communications to make a commitment to uphold our ethical standards and this charter.**

A CHARTER **FOR GOOD!**

FOR ALL COMMUNICATORS
Employees, external agencies, service providers, etc.

FOR ALL ISSUERS
FDJ UNITED, one of our product brands (illiko®, 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 FDJ UNITED.

1.

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,
- in France, ensure that commercial communications comply with **the guidelines and recommendations of the ANJ regulatory authority which are based on legislative and regulatory texts,**
- ensure that all communications comply with the FDJ UNITED brand book **"The Code" and with the associated graphic charter.**



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)** available on the Group's website (https://www.fdjunited.com/fr/objectifs-de-developpement-durable/),
- **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,

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** (the 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 Center),
- **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 UNITED Foundation is not bound by this commitment.
- **ensure that all actors chosen for the Group 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 pictogram, reminding viewers that gambling is prohibited for minors, on all our commercial communications, as well as on our games, websites, applications, and at points of sale.
- **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 systematically materialistic depictions of money/winning (yacht, private jet, fine villa, etc.),
- **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 FDJ UNITED** or one of its **sub-brands** in my communications,
- **a warning message must be included in a clear and visible manner,** in compliance with the requirements applicable to the relevant medium, whenever any gambling brand within the Group's portfolio is mentioned.



Regarding the warning message and how it should be integrated into advertisements, please refer to the document entitled "FDJ Communications Guidelines", which explains in detail the rules for including the message for each media type.
This document is available on the Group's Brand Center **(https://brandcenter-fdjunited.com)**

FOR AUDIOVISUAL MEDIA

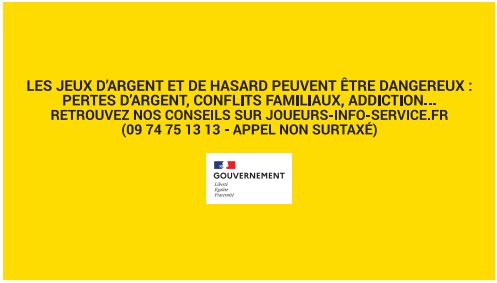
I must include the warning message using one of the following methods:

- **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:

  For example:



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



FOR RADIO BROADCASTS

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

« Les jeux d'argent et de hasard peuvent être dangereux : pertes d'argent, conflits familiaux, addiction... Retrouvez nos conseils sur joueurs-info-service.fr et au 09 74 75 13 13, appel non surtaxé ».

FOR DIGITAL MEDIA

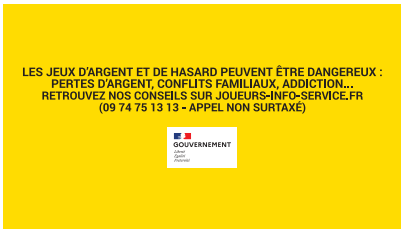
- **Website and apps:**
  I place the warning message inside **a yellow-background box with a minimum size of 10% of the size of the screen concerned.** The message is **fixed and permanently visible,** without any alteration to its content.

  When specific messages refer to stages in the player's journey, I place the warning message inside **a yellow-background box with a minimum size of 75% of the height of the image concerned.** The message is fixed and permanently visible, without any alteration to its content. The message must be displayed across the entire surface of the broadcast screen for a duration of 5 seconds, immediately following the commercial communication, on a yellow background.

- **For all other formats (mailings, online video, influencer marketing, etc.), with the exception of VOD, for which the warning message is the same as the one used for television.**
  - **Skippable format:** I must include the warning message in a textbox with **a yellow background and a minimum size of 15% of the height of the image on which it appears.** The message must be fixed in place and permanently visible, without any changes to its content.



  - **Non-skippable format:** I must include the warning message across the **entire area of the display screen for a period of 5 seconds.**



IMPORTANT: Wherever possible, the message should be clickable and link to the www.joueurs-info-service.fr website (size not specified).

NB: The following are not bound by this commitment:

- In-house communications
- Communications for **brands with no connection to betting, and which do not feature any betting brands** and/or commercial brands (such as FDJ).

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.

For example:



FOR SCRATCH CARDS

I place the warning message inside **a yellow-background box with a minimum size of 8% of the height of the physical medium's surface area.**

I WILL

- In my communications, **make it clear whether the message is an advertisement:**
  - **for print media,** use the official logo of FDJ UNITED 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** with the message "Advertisement" or "Marketing collaboration", so that the audience clearly understands that the content is sponsored: this must be clear and legible.

- More specifically, regarding **influencer/digital marketing, I will:**
  - follow this responsible communication charter, available on the Group's Brand Center **(https://brandcenter-fdjunited.com), and check that partner agencies/influencers have fully understood the 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 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) and apply the "Influencer Profile Selection Guidelines" available on the Group's Brand Center (https://brandcenter-fdjunited.com),
- **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,
- **work exclusively** with influencers holding **the ARPP Responsible Influence 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. a cross) 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 UNITED or its various commercial brands and subsidiaries.



F. RESPONSIBLE USE OF GENERATIVE AI

Content generated or assisted by artificial intelligence remains subject to the same ethical, regulatory, and editorial requirements as all content produced by FDJ UNITED, including those set out in Sections 1.A to 1.E of this Charter.

Using AI appropriately and responsibly

I WILL

- **Ask myself the key question before any use : "Do I really need it?"** and reserving its use for situations where it provides genuine added value, while recognizing that the training and use of AI models consume significant amounts of energy and water, generate electronic waste, and contribute to carbon emissions,
- **support AI projects that incorporate environmental and social criteria,** by promoting the use of resource-efficient models, limiting unnecessary use cases, and remaining attentive to social impacts (inclusion, accessibility, and bias reduction),
- **disclose the use of artificial intelligence whenever relevant, in the interest of transparency,**
- **remain fully accountable for all published content,** regardless of the technology used, and **systematically reviewing and validating** any AI-generated content before it is distributed.

Adopting sustainable digital practices

I WILL

- **Give priority to existing resources,** particularly the image libraries available through the Brand Center (https://brandcenter-fdjunited.com) and using AI-generated images only as a last resort,
- **write clear, precise, and targeted prompts in order** to limit unnecessary requests and avoid excessive digital resource consumption,
- **develop my knowledge and skills in AI usage** (for internal employees: the AI Booster learning pathway, including the mandatory Star Explorer e-learning module),
- use AI-powered transcription **only when appropriate and with the agreement of the stakeholders concerned.**



2.

RESPONSIBLE CIRCULATION

I WILL

- **Include subtitles and audio description** if my content is a video or TV commercial, and apply the principles set out in the "Guidelines for Accessible Communications from UDM-ARPP" available on the Group's Brand Center (https://brandcenter-fdjunited.com),

- **ensure that my content is accessible to people with disabilities,** wherever possible (people with reduced mobility or hearing or visual disabilities),

- **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 government website: https://www.ecologie.gouv.fr/sites/default/files/FAQ%20Triman%20et%20frises.pdf
  - 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,
  - in terms of communication campaigns, I commit to respect, as much as possible, **the principles set out in FDJ UNITED's "Good practices guide for eco-responsible advertising"** available on the Group's Brand Center (https://brandcenter-fdjunited.com),

- **not advertise in controversial media,**
- **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 self-excluding 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 advertising space broker's capabilities, **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),
  - **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, video formats, etc.) and encourage my service providers and the media selling advertising space to develop their use of such formats,

- **never use flyposting tactics on the street,**

- **set aside 10% of the annual media budget (excluding performance) to support responsible gaming messages,** in order to share preventive information with players.



3.

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,**
- **ensure that sensitive or confidential data is not shared with unauthorized AI tools,**
- **use FDJ UNITED-approved and secure solutions as a priority,**
- not use AI to make sensitive decisions without human review and validation,
- pay particular attention to **the potential biases** of AI systems and their impact.



4.

BALANCED RELATIONS WITH OUR SERVICE PROVIDERS AND PARTNERS

I WILL

- **Through my behaviour, uphold the principles of action set out in the FDJ UNITED'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).

5.

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@fdjunited.com
    validationsdjur@fdjunited.com
    validationsjr@fdjunited.com
    validationsdirap@fdjunited.com
  - for each communication campaign, the FDJ UNITED stereotype and eco-friendly behaviour grid must be filled in and sent to brand-management@fdjunited.com
  - to complete the ex-ante campaign validation form for so-called large-scale campaigns.

- **Significant uses of generative artificial intelligence must be communicated to the Data & AI teams** to ensure appropriate support, consistency of practices, and compliance with the governance framework established by FDJ UNITED.



SOURCES

- French Order of 11 July 2023 on the warning message against problem or pathological gambling that must be used in marketing content appearing online
- French Order of 29 July 2022 on the warning message against problem or pathological gambling that must be used in marketing content appearing in cinemas via audiovisual communications services, via print media, displays and radio broadcasts
- French Order of 4 March 2026 relating to the content and display requirements of the warning message concerning the risks associated with excessive or pathological gambling
- Autorité de Régulation Professionnelle de la Publicité (French Advertising Standards Authority – ARPP) – Recommendation on betting, 27 July 2022
- Guidelines issued by the Autorité Nationale des Jeux (French National Gaming Authority – ANJ) (Statement No. 2022-C-001 of 17 February 2022)
- French Decree 2020-1349 of 4 November 2020
- 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 marketing, promotional
and sponsorship materials
is available on
the Group's Brand Center
(https://brandcenter-fdjunited.com).

Concept

Brand Strategies and Group Visual Identity

Design

Rangoon

Photo credits

Getty Images, Pierre Morel - La Company

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La Française des Jeux - 315 065 292 - RCS Nanterre

FDJ UNITED