

# Sustainable purchasing Charter



FDJ is the successor of the Loterie nationale (National Lottery) which was created in 1933 to aid soldiers wounded during World War I. As a result, corporate social responsibility and solidarity are central to its business model.

In 2006, FDJ introduced a Corporate Social Responsibility (CSR) policy taking account of all its stakeholders' expectations.

In 2020, the FDJ adopted a "purpose" confirming its determination to continue developing its business model combining performance, responsibility and social utility:

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

In conjunction with its CSR policy and purpose, FDJ and its subsidiaries (the "FDJ Group") have been committed to a Sustainable Purchasing approach since 2012.

In 2014, FDJ signed the "Sustainable Procurement and Supplier Relations" (SPSR) Charter, steered by the Médiateur des Entreprises of the Ministère de l'Économie et des Finances.



In 2021, FDJ was awarded the "Sustainable Procurement and Supplier Relations" Label, which sets apart French organisations having demonstrated sustainable and balanced relations with their suppliers and who are committed to improving their practices.

With this, the FDJ Group encourages the development of purchasing best practices with all its stakeholders. To this end, the Group invites its suppliers to commit to a sustainable purchasing journey by signing the SPSR Charter resulting, for those most committed, in the award of the SPSR Label. For further information, please visit the website at the following address: <https://www.economie.gouv.fr/mediateur-des-entreprises/charte-relations-fournisseurs-responsables>

As part of a continued improvement process, benefitting the Group's extra-financial performance, the CSR policy and the Sustainable Procurement approach have been strengthened over the years in terms of their social, societal and environmental aspects.

In particular, the FDJ Group involves its suppliers in the implementation of a common approach to progress with a view to:

- Promoting open and constructive dialogue throughout commercial and contractual relations relating to the supplier's ability to comply with the commitments set out in this charter,
- Defining and monitoring the actions for improvement required to comply with the commitments set out in this charter, throughout commercial and contractual relations,
- Sharing their experience and innovations, and collaborating towards the implementation of concrete environmental, social and societal actions,
- Contributing towards the various labels and certifications.

Keeping this in mind, the FDJ Group intends to guide all its suppliers towards committing to this approach.

This Sustainable Purchasing Charter formalises the FDJ Group's expectations of its suppliers as regards ethics, the fight against corruption, respect for human rights and the protection of the environment. **It complements the FDJ Group's Ethics Charter, Anti-Corruption Code of Conduct and Human Rights Policy.**

By adhering to this charter, the supplier agrees to comply with and implement all principles set out therein when conducting its activities for the FDJ Group, without prejudice to applicable contractual provisions and national laws. It also undertakes to make all efforts to ensure that the individuals it enters into contracts with in the context of its activities for the FDJ Group (notably including its subcontractors, service providers, suppliers and consultants) make equivalent commitments to those set out in this charter and comply with them.

## **1. Supplier commitments**

The FDJ Group requires its suppliers to comply with the principles defined below and to commit to making all efforts to implement these principles in a transparent manner across their value chain.

### **a. Ethics and anti-corruption**

The supplier undertakes to comply with the highest standards in terms of integrity and anti-corruption conformity when conducting its business and to apply standards at least equivalent to those applied by the FDJ Group. (see FDJ Group's Ethics Charter and Anti-Corruption Code of Conduct at <https://www.groupefdj.com/en/ethics-and-compliance/>).

### **b. Human Rights**

The FDJ Group respects all internationally-recognised fundamental Human Rights and strives 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. FDJ Group's Human Rights Policy is available at the following link: <https://www.groupefdj.com/en/ethics-and-compliance/>

In this respect, the supplier undertakes to comply with the FDJ Group's Human Rights Policy, the standards set out in the following international reference texts, and ensures that its own suppliers adopt the same approach when conducting their activities for the FDJ Group: the International Labour Organization Declaration on Fundamental Principles and Rights at Work, the Universal Declaration of Human Rights, the United Nations Guiding Principles, the ILO Tripartite Declaration of Principles and

the OECD Guidelines as well as regulations in force in countries in which the supplier conducts its business.

The supplier ensures that it acts in an exemplary manner in terms of corporate social responsibility, notably 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, i.e. of individuals aged under 15 years old or younger than the age on which compulsory education ends, or having not reached the legal age to work in the country, whichever is the oldest.

**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 it operates.

**RESPECT** for freedom of expression, union rights and collective bargaining rights.

#### **c. Diversity and Inclusion**

FDJ has been awarded the Diversity Certification and Workplace Male and Female Equity Certification since 2013. These certifications attest to best practices in the prevention of discrimination, respect for equal opportunity and the promotion of diversity within the FDJ Group. FDJ encourages its suppliers to apply a pro-active policy as regards workplace equality and diversity, equal opportunity and the prevention of discrimination.

The supplier strives to encourage commercial collaboration with inclusive structures promoting the inclusion of people isolated from employment or with disabilities through work.

#### **d. Climate, biodiversity and natural resource protection**

The FDJ Group undertakes to minimise the direct or indirect negative impacts of its activities on the environment, and to continue to improve its environmental performance. The FDJ Group is committed to following a roadmap to reduce its carbon emissions and recommends that its suppliers follow a similar roadmap.

The supplier undertakes to comply with environmental laws and regulations in force in the countries in which it conducts its activities for the FDJ Group and, notably, to obtain and comply with all permits, authorisations and registrations required in environmental matters. It undertakes to identify and minimise the environmental impacts of its products and services throughout their lifecycle while maintaining and/or improving their quality, notably:

- By controlling its greenhouse gas emissions: the supplier undertakes to adopt a strategy to track and reduce its emissions. Upon request, it will provide the FDJ Group with its most recent carbon report or, where it does not issue such a report, any business information requested by the FDJ Group as regards the services provided and/or goods supplied.

- By optimising its energy consumption,
- By applying eco-design principles and implementing circular economy principles throughout the product or service’s lifecycle,
- By reducing and optimising use of its raw materials for its supplies and the manufacturing of its products and packaging while promoting the use of recycled and/or reconditioned raw materials,
- By ensuring the traceability of the raw materials used and providing related information at the request of the FDJ group,
- By steering and reducing the impacts of its activities on biodiversity,
- By reducing the release of pollutants, and notably those considered dangerous, into water, air and soil,
- By reducing the waste generated in the various stages of its activity,
- By complying with regulations on the collection, processing and end-of-life management of the FDJ Group’s waste in the context of Extended Producer Responsibility (EPR) chains; where concerned, the supplier will provide the quantities of waste generated and information on their end-of-life management at the FDJ Group’s request,
- By complying with applicable laws and regulations on information on product composition, including those relating to chemical or dangerous substances.

**e. CSR risk management**

The Purchasing Department has adopted a CSR risk map identifying potential CSR risks for each purchasing category according to the issues of: corruption, personal data, property rights, natural resources, biodiversity, greenhouse gases, pollutions, waste, working conditions, discrimination, health and safety, child labour, and forced labour.

The supplier undertakes to regularly have the level of maturity of its CSR performance assessed by an external third party (Ecovadis, Afnor, or other), to share this assessment with the FDJ Group and, where necessary, to provide additional information on issues identified as high CSR risks.

**2. Compliance with the Sustainable purchasing Charter – control and access to information**

This Charter is an integral part of the contractual provisions between FDJ and the supplier.

The supplier undertakes to comply and ensure compliance by its employees, subcontractors, suppliers and business relations with the principles set out in this charter.

To ensure compliance with the supplier commitment principles set out in paragraph “1. Supplier commitments” above, for the duration of the contract, the supplier will provide the FDJ Group, upon request and at any time, with all information demonstrating such conformity.

The FDJ Group or its authorised internal or external representative may carry out surveillance activities targeting the supplier and its subcontractors in order to assess compliance by the supplier and its own suppliers and subcontractors with the supplier’s commitments listed in paragraph “1. Supplier commitments”. This includes on-site inspections following reasonable notice (where possible based on circumstances), the completion of questionnaires and interviews with workers freely chosen from within the supplier’s premises, on manufacturing sites and/or in other places where work is carried out on behalf of the supplier as part of its activities for the FDJ Group.

The supplier undertakes to make all efforts to welcome, through its own suppliers and subcontractors, any internal or external auditors who may be mandated by the FDJ Group to ensure compliance with its commitments.

The supplier undertakes to resolve any identified non-conformities.

Where the supplier is not able to comply with certain provisions set out in the charter, due to special circumstances, or has reason to believe that it or one of its subcontractors has breached its obligation to comply with the above commitment principles, it will be required to immediately inform the FDJ Group in order to determine the corrective measures to be implemented.

The FDJ Group may assist the supplier with the implementation of these commitments and the resolution of any non-conformities.

Any serious breach by the supplier to the principles set out in this charter will constitute a breach to its contractual obligations and be the subject of an in-depth joint analysis in order to determine the action to be taken with a view to quickly resolving these shortcomings. Should the supplier refuse to implement an improvement process to overcome these shortcomings, or in the event of proven persistence of these shortcomings, the FDJ Group reserves the right to terminate the contract with the supplier.

### **3. Whistleblowing and collection of alerts**

The FDJ Group has introduced a whistleblowing system open to all, including the supplier and its own suppliers and subcontractors conducting activities for the FDJ Group.

This system governs alerts relating to conduct that is contrary to the principles or procedures set out in the FDJ Group's Sustainable purchasing Charter, Ethics Charter, Anti-Corruption Code of Conduct and Human Rights Policy (<https://www.groupefdj.com/en/ethics-and-compliance/>).

This system can be accessed at the following address: <https://report.whistleb.com/en/fdj>

It guarantees the confidentiality not only of the identity of the person issuing the alert but also of that of the persons concerned by the alert and of any information collected in this context.

**Sustainable purchasing Charter contact:** [sustainablepurchasing@fdj.com](mailto:sustainablepurchasing@fdj.com)



In order to enter into a business relationship with an FDJ Group entity, the supplier indicated below certifies that it will comply with this Sustainable purchasing Charter and its requirements.

Company name:

Surname and first name of the signatory:

Title:

Date:

Signature: