



Gaming Anti-Fraud Policy



2025

Our Purpose

FDJ Group offers people who wish to experience the thrill of gaming and moments of emotion a wide range of responsibly-designed games:

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

We promote recreational gaming by accompanying our customers, creating games with built-in integrity, and reducing the risks and consequences which arise from our activity. The FDJ Group operates in a sector that is highly regulated, given the specific risks it entails in relation to public and social order. Fully aware of the issues at stake and in keeping with its commitment, the Group is pursuing a proactive policy designed to effectively prevent its games and services from being used with fraudulent intent and to ensure the integrity, reliability and transparency of its operations. With this in mind, the FDJ Group maintains a constant dialogue with all the relevant stakeholders in France and other countries in the various markets in which it operates: administrative authorities regulating and overseeing compliance with anti-fraud laws, police and investigative authorities, etc.

As one of the leading gambling operators in the world, the FDJ Group has a duty to protect its players, its network of retailers and its employees from any risk of fraud to which it may be exposed.

The objectives of this policy are as follows:

- ◆ To promote a culture of integrity and responsibility;
- ◆ To prevent and deal with suspicions of fraud;
- ◆ To ensure compliance with the law and regulations.

Scope and regulatory context

The FDJ Group offers its clients several types of game on various channels – point-of-sale and/or online – in different countries in Europe, and particularly:

Games under exclusive rights:

- ◆ Lottery games: digital & Retail network;
- ◆ Retail sports betting.

Online games on a non-exclusive basis:

- ◆ Sports betting;
- ◆ Poker;
- ◆ Horse betting;
- ◆ Online casino.

As one of the global leaders in gaming, the FDJ Group is responsible for protecting its players, its sales network, and its employees from all the risks of fraud to which it is exposed.

The FDJ Group operates cash games on regulated markets, under a monopoly and/or on a non-exclusive basis, and is thus subject to the regulation of various local bodies according to the markets on which it operates.

This policy is valid as internal guideline for the entire FDJ Group and applies in mainland France, in the overseas département, regions and communities, and in all countries where the Group offers gaming activities, directly or through its subsidiaries.

Combating gambling fraud

As lottery and gaming operator, the FDJ Group is exposed to many forms of fraud that could occur at every stage of the gaming process from game design to payment prize.

Fraud is defined as a “wilful act or omission having the purpose of misleading one or more third parties with the aim of obtaining an unlawful gain, generally financial, with the intention of evading the laws, regulations and internal rules of the group.”

This policy applies to fraud or suspected fraud committed by:

- ◆ The employees of the group and the service providers;
- ◆ The owners of points-of-sale and their employees;
- ◆ The players;
- ◆ The suppliers linked to the gaming activities.

The following risks are examples of fraud to which the FDJ Group is exposed:

Risks linked to the games:

- ◆ Placing bets on sports events or horse races where there is a strong suspicion of match fixing;
- ◆ Gaming transactions between participants suspected of collusion;
- ◆ Use of computer robots in gaming transactions;
- ◆ Placing bets on known outcomes;
- ◆ Gaming strategy to monetise fraudulent means of payment: calculated bet distribution (surebets), betting significant sums on low odds.
- ◆ Theft of tickets/scratchcards;
- ◆ Stealing of a winning ticket/games receipt;
- ◆ Fraudulent resale of tickets (stolen, expired, altered, etc.);
- ◆ Falsification of lottery results or interference with lottery equipment.

Risks linked to means of payment or identity documents:

- ◆ Opening accounts or proving identity with documents suspected of being counterfeit, stolen or falsified;
- ◆ Deposits or payments made with means of payment suspected of theft or misuse;
- ◆ Promotion abuse.

Governance

As parent company of the group, FDJ SA ensures that each of the entities involved effectively applies a consistent gaming anti-fraud mechanism adapted to the identified risks. It manages the mechanism at FDJ Group level.

A Group committee meets several times a year with the following objectives:

- ◆ Coordinating the different actions implemented by the entities of the FDJ Group according to the identified risks;
- ◆ Sharing good practice.

Prevention

- ◆ A regularly updated fraud risk assessment, in conjunction with formalised action plans for the most significant risks;
- ◆ Formalisation of the procedures and requirements to be respected;
- ◆ Regular training for employees along with publicity and awareness-raising actions for players and the sales network, as required.

Training sessions, adapted to the positions held within the company and the level of risk exposure, are regularly organised in order to update employee knowledge, increase their skills, and maintain a high degree of vigilance.

In France, FDJ SA is also deploying its fraud risk awareness approach with the retailers of its physical network of points-of-sale and with the service providers involved in anti-fraud procedures. FDJ SA also regularly conducts player publicity actions to raise awareness of the risk of swindling (e.g. theft of the FDJ identity).

Detection

- ◆ Detection and analysis of suspicious operations via automated systems – in real time and/or post facto;
- ◆ An internal control approach to ensure respect for the mechanism;
- ◆ Feedback and dialogue channels enabling employees, players and other stakeholders to report atypical situations, notably via the ethical whistleblowing platform which makes it possible to send any report or any subject which may seem to go against the ethical principles and commitments of the FDJ Group;
- ◆ Player identification mechanisms.

Remediation

- ◆ Interim measures and sanctions if the case is proven;
- ◆ An approach of investigation and escalation to the competent and independent authorities according to the cases encountered, which may lead to filing of a complaint or transfer to the competent authorities;
- ◆ An approach of monitoring of the mechanism with a view to continuing improvement to avoid recurrence, and of reporting to the competent authorities and entities.

Control of the activities practised in the retail network

In France, FDJ SA has established the following specific mechanisms to check the activities practised in the retail network:

The opportunity to sell FDJ games is linked to an authorisation to be obtained after investigation from the Central Gaming and Racing Service (specialist unit of the criminal investigation police), aiming to check the morality of the future retailer and the origin of the funds necessary to buy the business.

A department of inspectors who act as mystery shoppers and visit the retailers with a view to verifying application of the marketing rules with respect for a defined player journey, and the absence of fraud.

Identification of occasional customers playing in their network of points-of-sale, when they bet sums higher than the legal limit or in case of situation suggesting a risk of fraud. In the payment of prizes, FDJ SA furthermore applies a proactive KYC policy for winners, excluding the use of cash and requiring payment by bank transfer for sums below the legal threshold.

After examinations by specialist fraud analysts, the alarms from the sensors and the results of the inspections, FDJ SA applies immediate interim measures aiming to protect customers, and in case of proven fraud to file a complaint or take contractual sanctions against the retailer as applicable.

Control of the activities practised online

The use of a player account requires every online customer to register first, to enter the customer identity, their postal address of tax residence, personal information, and to accept the general terms and conditions, at the end of which a player account is opened and certified.

In compliance with the legal provisions in force, the group identifies its customers holding an online player account and verifies their identity using any written evidentiary document. For this purpose, the group uses its identity document authentication services.

After an examination by specialist fraud analysts for any atypical activity, the group applies immediate interim measures in cases of suspected fraud, to protect itself, customers, and integrity of the game. These measures can include blocking accounts in accordance with the general terms and conditions. In case of proven fraud, the group will file a complaint with the competent authorities as applicable.