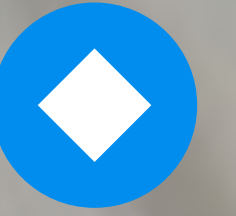


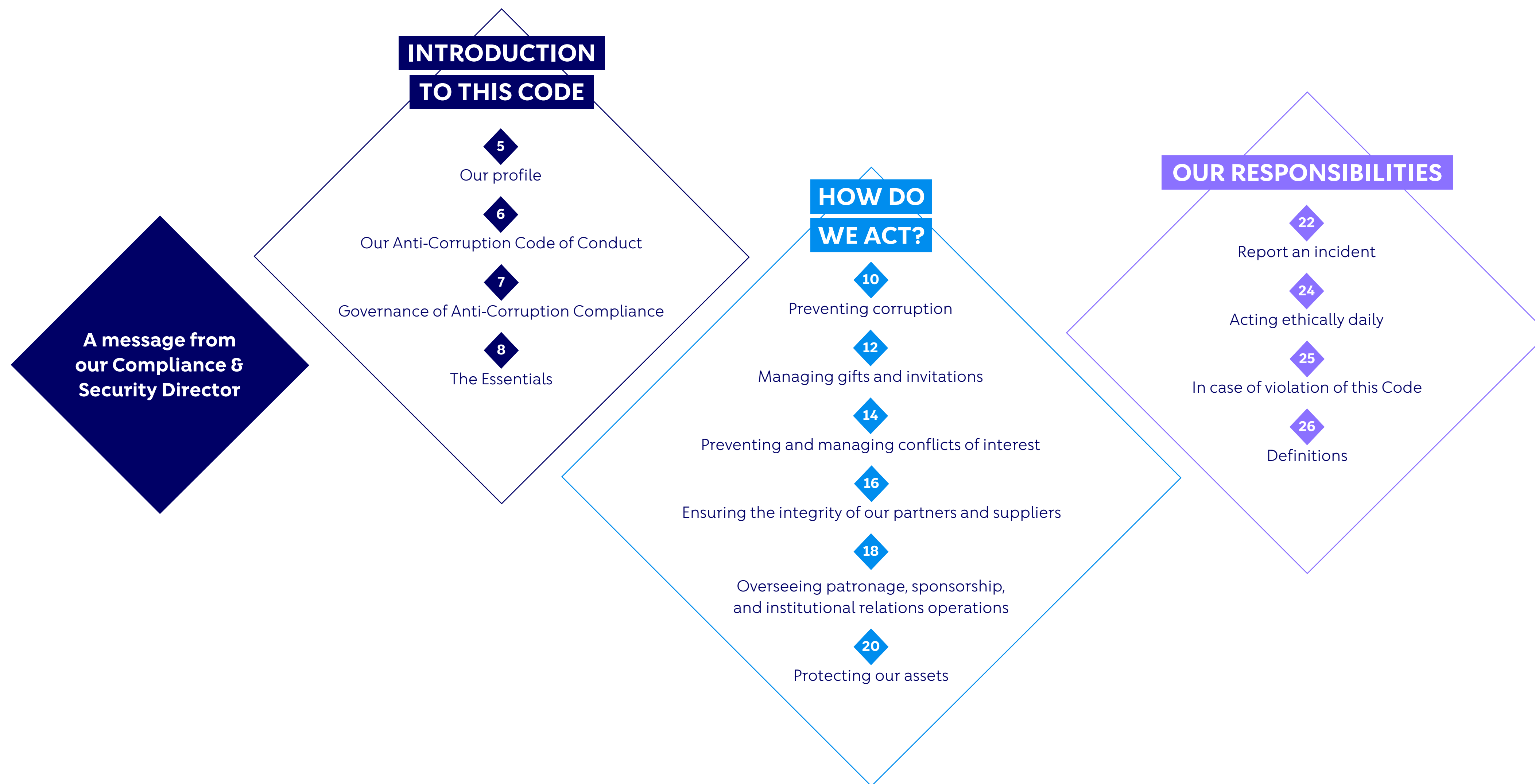
**ANTI-CORRUPTION  
CODE OF CONDUCT  
2026**



**FEDJUNITED**



# SUMMARY



# A MESSAGE FROM OUR COMPLIANCE & SECURITY DIRECTOR



At FDJ UNITED, **integrity and fairness guide everything we do**, from assisting our customers to ensuring fair play in our games. We also work to reduce the risks and impacts of our activities by preventing underage gaming and addictive behaviours.

In today's world, transparency and ethics are essential for sustainable business. We all share the responsibility to act honestly, fairly, and in full compliance with the law.

Corruption, in any form, is a serious threat. It can damage our reputation, weaken the trust of our stakeholders and players, and expose the Group to legal and financial risks.

This is why we have a **zero-tolerance approach to corruption**. This Anti-Corruption Code of Conduct, which complements the Group Ethics Charter, sets out the behaviours and rules to prevent corruption and influence peddling. More than a set of procedures, it reflects our collective commitment to ethics and transparency at every level of the organization.

You play **an active role** in turning our commitment into action by:

- Acting with integrity every day, in line with this Code;
- Actively preventing corruption by anticipating risks, asking questions, and reporting any concerns.

You are not alone in this mission! The Ethics & Anti-Corruption team is here to guide you on a daily basis: together, let's strengthen a culture of transparency and zero tolerance across FDJ UNITED.

**Thank you for your vigilance and your commitment.** Together, let's make integrity part of how we work every day - it's what keeps trust strong and helps us succeed.

**Philippe Lemaire**  
Compliance & Security Director

# 1

# Introduction to this Code

- 5 Our profile
- 6 Our Anti-Corruption Code of Conduct
- 7 Governance of Anti-Corruption Compliance
- 8 The Essentials

# OUR PROFILE



FDJ UNITED provides a wide range of secure and responsible lottery, betting and gaming experiences worldwide, so millions can play with confidence. This trust is precious - and we **need to protect it** wherever we operate.

Corruption is a global issue and it can affect us all, both at work and in everyday life. The European Commission estimates that the cost to the EU economy ranges from €179 to €990 billion each year\*. In other words, EU citizens lose nearly 6% of EU GDP. These resources could fund vital public services, such as health, food, and housing.

**Corruption is not a victimless crime.** It undermines a society's capability to address social, environmental, or economic challenges.

Fairness and transparency are fundamental principles in the gaming and betting sector.

Any sign of corruption may erode credibility and damage our relationships with players, partners, and other stakeholders.

At FDJ UNITED, we are **committed to combating corruption** in line with our purpose and values.

Guided by our Collective Spirit, Accountability, and Passion to succeed, we promote best practices and reduce risks wherever we operate. Conscious of our collective responsibility to contribute to tackling corruption, we have a zero-tolerance approach to unethical behaviour.

**Your vigilance and integrity – every day, in every country and in every part of your role – are key to keeping the trust of our stakeholders. This trust makes our success possible.**

\* European Commission website, "Anti-corruption"

# OUR ANTI-CORRUPTION CODE OF CONDUCT

## Why an Anti-Corruption Code of Conduct?

Fighting corruption is essential to our **commitment to integrity, fairness, and transparency**. This Code of Conduct helps you act and make decisions responsibly, especially in complex or sensitive situations.

**It helps you:**

- Identify situations that could involve corruption, influence peddling, or other breaches of integrity.
- Clarify the conduct you must adopt and avoid following unethical business practices.
- Safeguard yourself, your colleagues, your partners, and the Group from legal, financial, reputational, and personal risks.
- Spot the appropriate contacts for any questions.

## Ensure compliance with anti-corruption standards

FDJ UNITED operates in a global environment and complies with **all relevant anti-corruption laws and standards**, including:

- France’s Sapin II Law;
- The UK Bribery Act (UKBA);
- The U.S. Foreign Corrupt Practices Act (FCPA);
- Any local laws and regulations in the countries where we operate.

**In the event of any conflict between this Anti-Corruption Code of Conduct and local laws or policies, the stricter or more protective standard shall apply.**

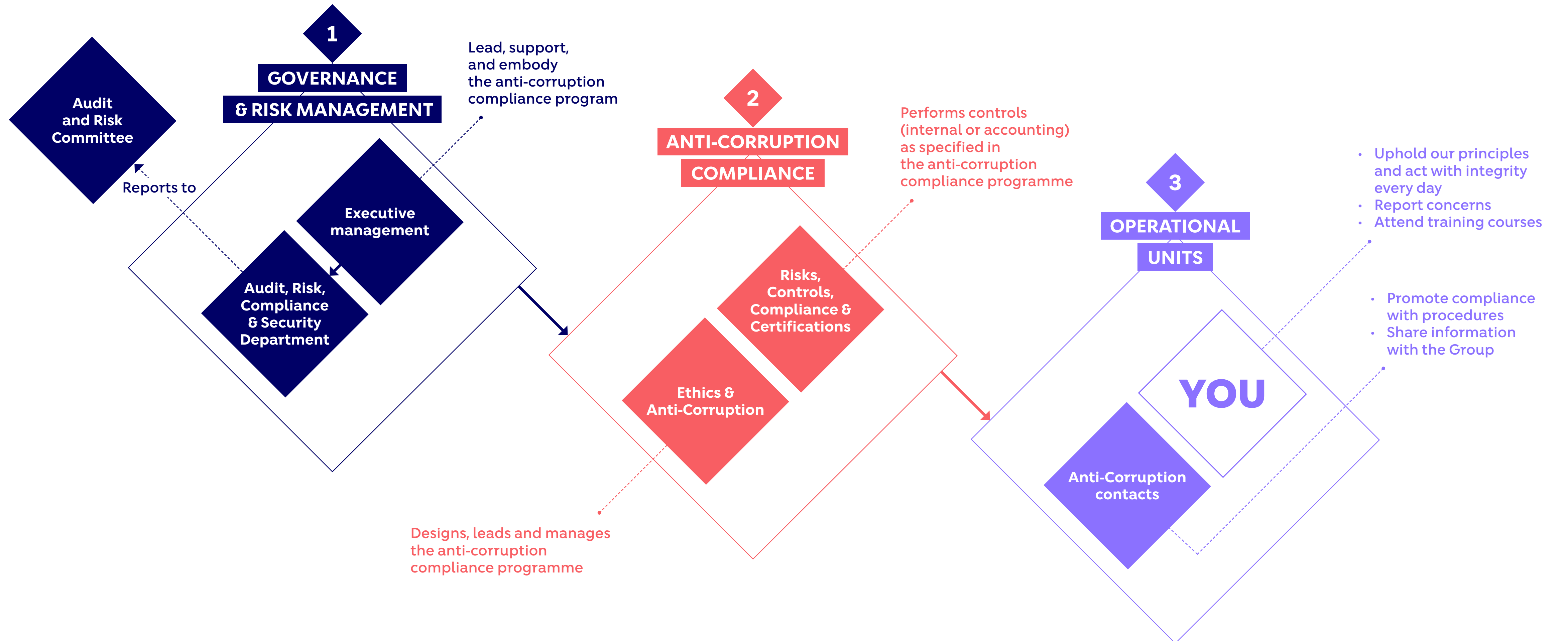
## Acknowledge your role

**This Code applies to everyone acting on behalf of FDJ UNITED**, including:

- All employees, whether permanent or temporary;
  - Managers and corporate officers;
  - Third parties such as customers, suppliers, service providers, business partners, and board members.
- Everyone has a part to play in preventing corruption.

# GOVERNANCE OF ANTI-CORRUPTION COMPLIANCE

Everyone at FDJ UNITED plays a role in preventing and detecting corruption:



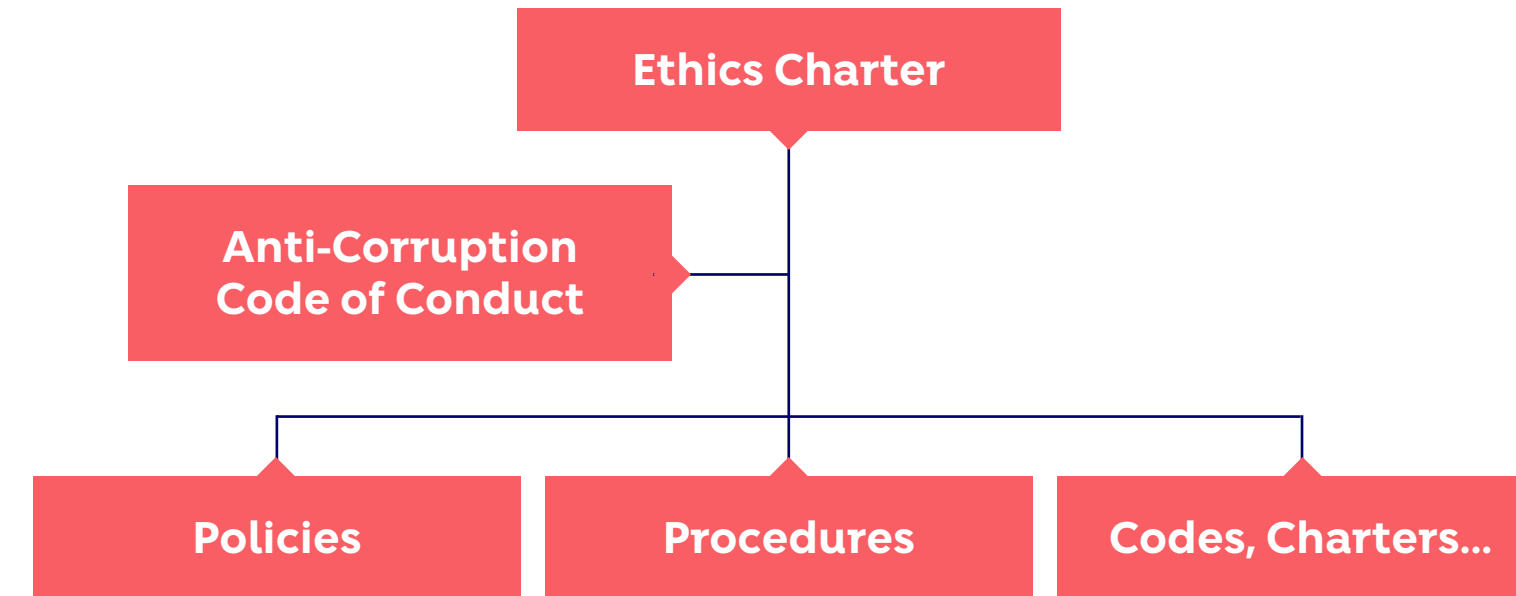
# THE ESSENTIALS

## Our ethical principles

**Our Ethics Charter brings together our core commitments** and consolidates the ethical principles that guide us.

**It is the Group's overarching reference document**, from which all other internal documents derive. This includes the Anti-Corruption Code of Conduct as a key reference on corruption prevention, as well as the Group's various procedures, policies, and charters.

You can find the Ethics Charter on [the intranet](#) and [the FDJ UNITED website](#).



The following **principles** guide every decision and action we take:

- Compliance with laws and regulations in all the countries where we operate.
- Integrity as a shared value across the entire organisation.
- Respect for people, including our employees, partners, customers, and stakeholders.
- Constructive dialogue with civil society, based on transparency and openness.

**We live these principles every day in how we work.**

**Our Anti-Corruption Code of Conduct** focuses specifically on preventing corruption and providing concrete guidance to help everyone make the right decisions in situations that could pose a risk.

## Preventing risky situations: tips to remember

To prevent corruption risks, **we must embrace key practices:**

- Never participate in any form of corruption whether active or passive, direct or indirect, in the public or private sector.
- Offer or accept gifts and hospitality transparently, within FDJ UNITED's limits, and declare any sensitive situations.
- Declare any actual or potential conflicts of interest immediately upon becoming aware of them.
- Ensure the integrity of partners and suppliers, particularly during the selection process.
- Ensure that no practice damages the trust or well-being of our stakeholders (players, employees...).
- Ensure transparent and responsible management of sponsorship, patronage, and institutional relations operations.
- Don't deal with uncertainty on your own. Ask for advice.

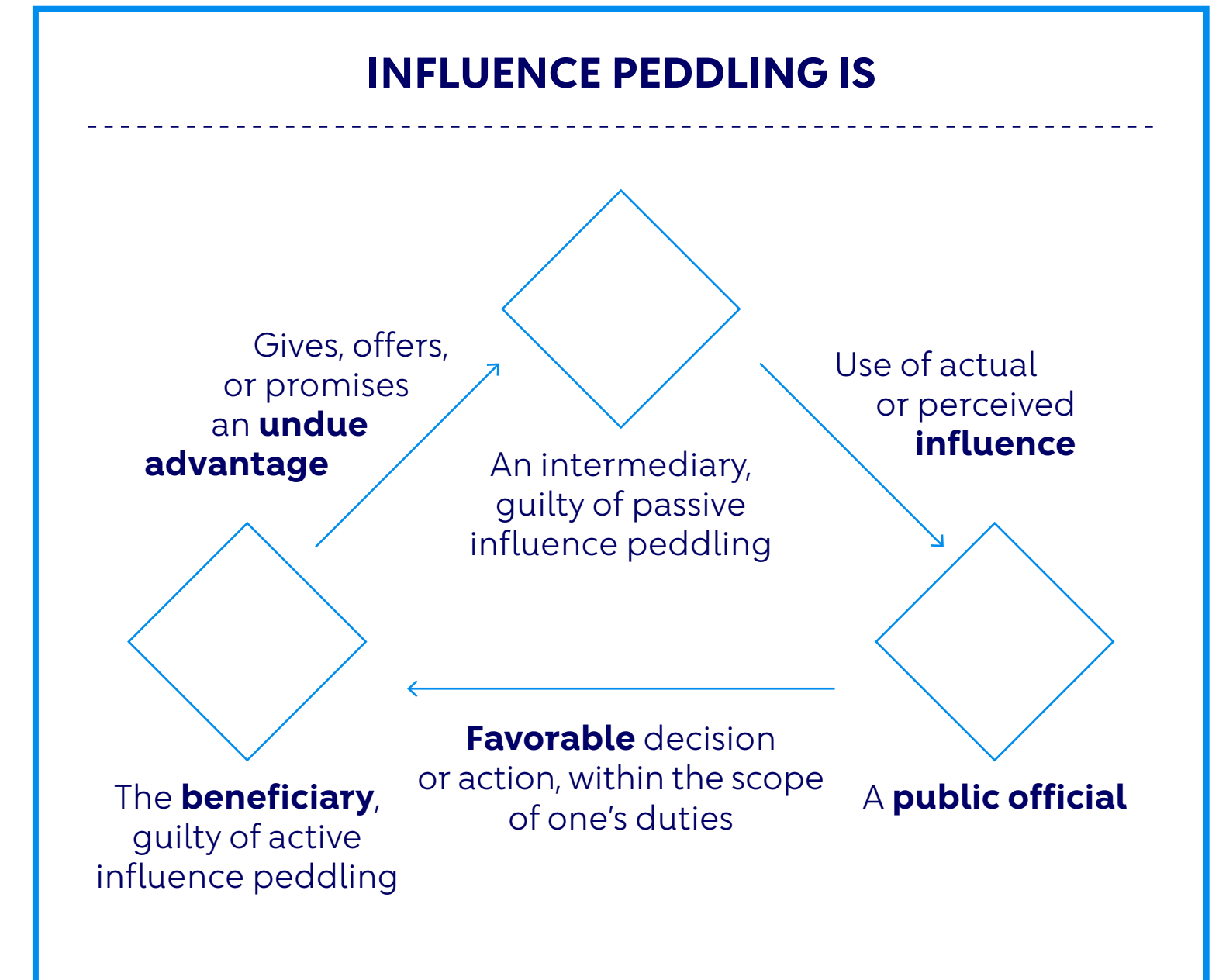
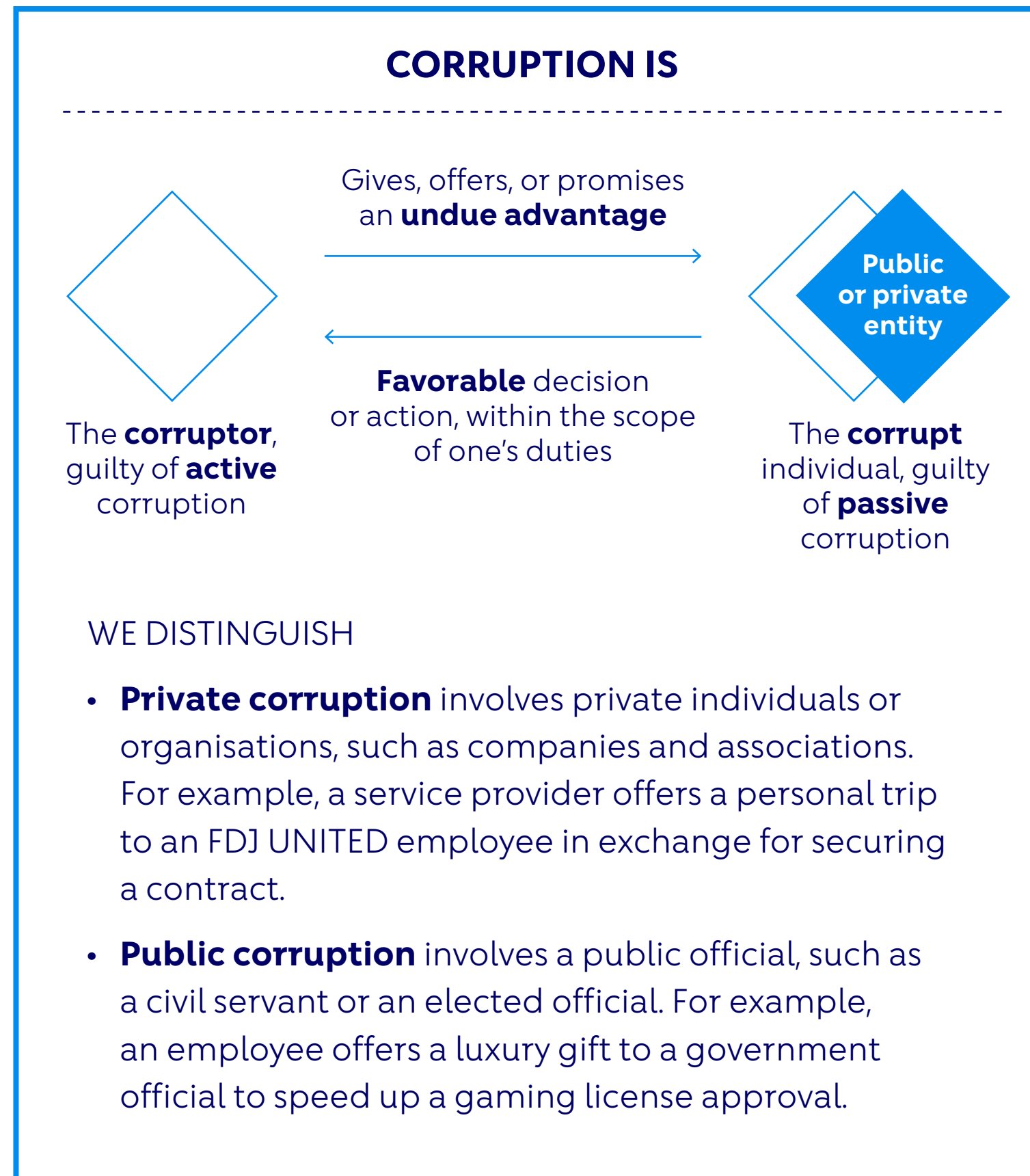
# 2

## How do we act?

- 10** Preventing corruption
- 12** Managing gifts & invitations
- 14** Preventing and managing conflicts of interest
- 16** Ensuring the integrity of our partners and suppliers
- 18** Overseeing patronage, sponsorship, and institutional relations operations
- 20** Protecting our assets

# PREVENTING CORRUPTION

We fight against corruption and influence peddling in all their forms and expect our partners to do the same. That is why we have implemented a corruption prevention programme based on regularly updated corruption risk mapping.





**CORRUPTION IS**

- ◆ **Seeking to obtain an advantage by offering, soliciting, or accepting undue benefits.**  
*Example: offering an expensive watch to secure a contract.*
- ◆ **Bypassing fair competition to favour a personal connection.**  
*Example: awarding a contract to a friend's company without proper sourcing.*
- ◆ **Creating advantages for close associates of decision-makers.**  
*Example: creating a consultancy role for an executive's relative to gain favourable treatment.*
- ◆ **Using donations or sponsorships to conceal an attempt to influence.**  
*Example: donating to a charity led by a director's spouse in exchange for securing a deal.*
- ◆ **Paying a public official to speed up or obtain an administrative agreement.**  
*Example: giving an undue benefit to a regulatory authority to obtain a favourable decision for the Group, such as a licence to operate.*

**CORRUPTION IS NOT**

- ◆ **Acting with transparency, fairness, and according to established rules.**  
*Example: distributing promotional FDJ UNITED gifts to all clients during a trade show.*
- ◆ **Maintaining professional relationships within reasonable and declared limits.**  
*Example: inviting a partner to a business lunch of a reasonable value to discuss collaboration and declaring it according to the gift and hospitality policy.*
- ◆ **Recruiting based on merit, through open and documented processes.**  
*Example: hiring a candidate after competitive interviews and formal evaluation.*

**STAY ALERT**

Gifts, invitations, links of interest, or poorly managed donations can all be signs of corruption. However, when handled transparently and in accordance with our rules, these do not constitute corruption.

**If you face a situation involving corruption, or that may resemble it, don't stay alone. Seek advice from:**

- The Ethics & Anti-Corruption team
- Your manager
- The anti-corruption relays



# MANAGING GIFTS AND INVITATIONS

We offer and receive gifts and invitations in a reasonable, controlled, and transparent manner.

Gifts and invitations refer **to any form of gratuity or benefit** offered or received during professional activities. This may include:

- The delivery of physical items (e.g., a pen, a box of chocolates, an artwork, a watch, a bottle of wine);
- Invitations to a meal, reception, trip, show, or sports event;
- The assumption of costs on behalf of others (e.g., travel, accommodation, or reimbursed expenses).

Gifts and invitations can help sustain courteous and trusting professional relationships. However, people may misuse them to influence decisions or attempt to bribe. They can create a **sense of obligation**, accountability, or a situation of conflict of interest. That is why you must stay vigilant and comply with the rules. Report any situation that could be misleading.

You can accept gifts or invitations only when they are not such as to affect your decisions during your regular duties.



## What is allowed\*:

- A gift or invitation of reasonable value, offered or received occasionally in a strictly professional context.
- Must not influence, or appear to influence, decisions or create any obligation.

## What requires prior authorisation:

- Any gift, invitation, or advantage sensitive due to its nature, value, frequency, or the recipient's identity, such as a public official.
- Coverage of additional expenses such as travel or accommodation costs.

## What is prohibited:

- Offering or accepting a gift or invitation from a regulatory authority representative (such as [ANJ](#), [ACPR](#), [AFA](#), etc.).
- Any gift, invitation, or benefit offered or received during a critical period for the Group (such as tenders, contract renewals, etc.).

\*Refer to local procedure. Apply the most protective and demanding standard to ensure enhanced compliance within the Group.

**YOU MUST**

- ◆ Apply the principles set out in Gifts and Hospitality procedures.
- ◆ Consider the context, the country, and the implications of a gift or invitation.
- ◆ Respect the maximum thresholds for gifts and invitations.
- ◆ Ensure that any gift or invitation, whether offered or accepted, is reasonable.
- ◆ Stay informed about local customs and relevant regulations.
- ◆ Act transparently by registering gifts and invitations in the dedicated log.

**YOU MUST NOT OFFER OR RECEIVE GIFTS OR INVITATIONS**

- ◆ That are excessive or disproportionate in value.
- ◆ Aimed at obtaining an undue advantage or influencing a decision.
- ◆ Outside the scope of our professional duties.
- ◆ That would be difficult to justify to colleagues, family, or the media.
- ◆ Secretly, without informing anyone.
- ◆ From a member of a regulatory authority.
- ◆ To or from big prize-winners.
- ◆ During a critical period (e.g., negotiations, tenders, contract renewals).

**GOOD PRACTICES**

**During a tender, a marketing agency offers me a concert ticket in exchange for a favourable opinion from the attribution board. Can I accept it?**

No. Accepting a gift to influence a decision is an act of corruption. You must immediately refuse the proposal and report the situation to the Ethics & Anti-corruption team.

**I accept a lunch with a competitor in a prestigious place in exchange for sharing sensitive information about FDJ UNITED. Am I allowed to do this?**

No. Sharing confidential information in exchange for a personal benefit is a breach of trust and a violation of our ethical rules. It compromises the Group's integrity and may lead to disciplinary action or a lawsuit.





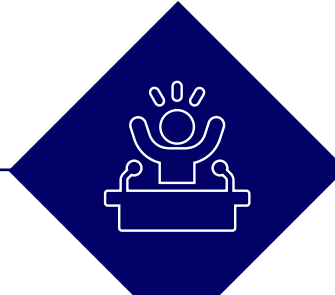

# PREVENTING AND MANAGING CONFLICTS OF INTEREST

We act in the best interests of FDJ UNITED. We declare conflicts of interest to prevent risks and ensure that our decisions remain beyond reproach.



A conflict of interest occurs when your personal interests risk affecting the proper performance of your duties. It can be direct or indirect and may involve you or someone close to you. Even the mere appearance of a conflict of interest is enough to raise concerns and must be taken seriously.

A personal interest can take many forms, for example:

			
<p><b>Family or friendship</b></p>	<p><b>Financial</b></p>	<p><b>Political</b></p>	<p><b>Associative or union-related</b></p>
<p>A close relative works for a potential service provider.</p>	<p>You hold shares in a supplier or partner company that works with FDJ UNITED.</p>	<p>You participate in a political group or campaign that interacts with FDJ UNITED.</p>	<p>Someone close to you is involved in an NGO requesting support or sponsorship from FDJ UNITED.</p>

Having personal interests is **not wrong**, but they can affect your judgment or raise questions. That's why it is essential to **declare it and remain fully transparent**.

**YOU MUST**

- ◆ Act with integrity and in good faith, avoiding any personal benefit.
- ◆ Withdraw immediately from any decision-making process if your impartiality might be compromised, even in appearance.
- ◆ Stay particularly vigilant in dealings with international third parties, whose ethical standards may differ from those of FDJ UNITED.
- ◆ Declare any relationship of interest (familial, financial, professional, or otherwise) in the dedicated register.
- ◆ Inform your manager or the Ethics & Anti-Corruption team of any situation that could cause a conflict of interest.

**YOU MUST NOT**

- ◆ Hide or minimise a link of interest, even if it appears minor or hypothetical.
- ◆ Take part in a decision or negotiation involving:
  - Someone close to you, such as a friend, spouse, or family member;
  - An entity in which you hold a direct or indirect interest.
- ◆ Accept a job or assignment with a supplier, client, competitor, or partner that could influence your judgment.
- ◆ Play at any of FDJ UNITED's sports betting offers, whether online or at retail points of sale.

**GOOD PRACTICES**

**An FDJ UNITED director forces the recruitment of a friend's child for a prestigious position. It doesn't follow the standard recruitment process. Is he allowed to do that?**

No. Using his position to favour someone outside of usual procedures creates a conflict of interest. Recruitment decisions must remain impartial.

**I selected a service provider managed by my partner, even though other suppliers made more competitive offers. Is this acceptable?**

No. Favouring a company due to a personal relationship, rather than objective criteria, is a conflict of interest. You must disclose any personal connection and recuse yourself from the decision-making process.



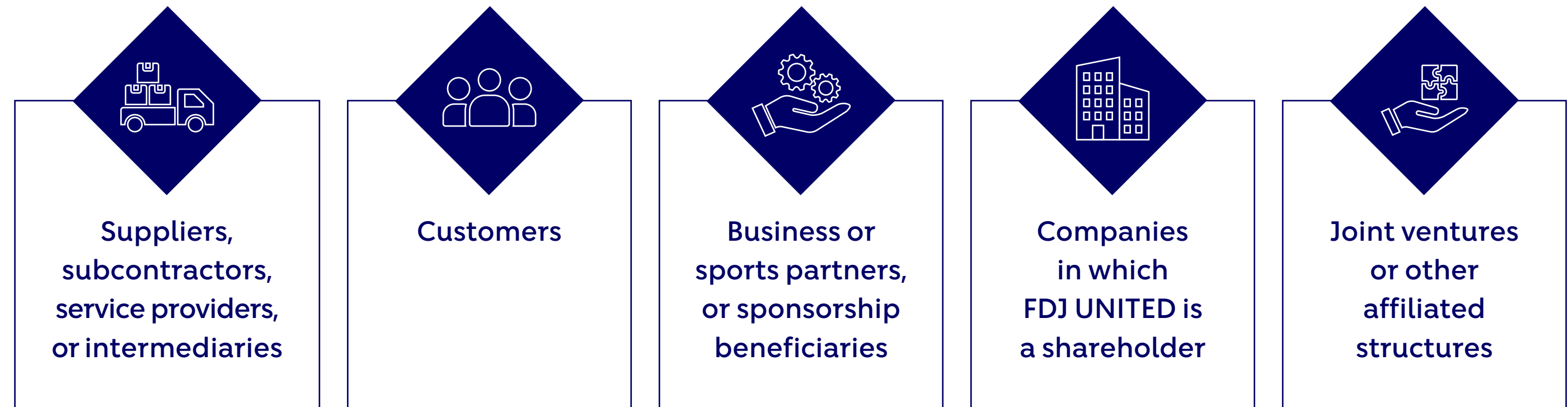
# ENSURING THE INTEGRITY OF OUR PARTNERS AND SUPPLIERS

We commit to working only with third parties that uphold ethical and lawful practices. Make sure these practices align with our values and obligations.

As FDJ UNITED develops new activities and expands internationally, we engage with an increasing number of external third parties. Their reputation and actions can have an impact on our reputation and operations.

A third party refers to **any individual or legal entity contractually connected to FDJ UNITED.**

This includes:



We must **verify the integrity of third parties.** To do so, we consider several criteria, such as their nature, the expenses incurred with them, and their geographical location.



**YOU MUST**

- ◆ Assess high-risk and exposed third parties before initiating a business relationship with them, wherever we operate.
- ◆ Ensure they comply with anti-corruption obligations throughout the business relationship.
- ◆ Report any suspicious or risky situation involving a third party via the FDJ UNITED Alert platform or to the Ethics & Anti-Corruption team.

**YOU MUST NOT**

- ◆ Enter a business relationship without first assessing the integrity of the third party.
- ◆ Enter negotiations for an acquisition or equity investment without first proceeding to necessary due diligences.
- ◆ Use an intermediary to carry out actions that are illegal or contrary to this Code.
- ◆ Attempt to obtain information or decisions from public authorities unfairly or inappropriately.

**GOOD PRACTICES**

**I am contacted by a business introducer who assures me that he can convince a client to award us the tender we responded to. The commission he proposes is significantly higher than market rates. Can I accept this request?**

No. This request could be an attempt at bribery. You must immediately inform your manager or the Ethics & Anti-Corruption team.

**I urgently need to finalize a contract with a high-risk supplier in order to move forward with a project. Can I proceed with the assessment after signing the contract?**

No. Never sign a contract with a high-risk third party without having conducted a thorough due diligence. Always consult your line manager or the Ethics & Anti-Corruption team first.



# OVERSEEING PATRONAGE, SPONSORSHIP, AND INSTITUTIONAL RELATIONS OPERATIONS

We act transparently and follow our internal ethical procedures to ensure our sponsorships and patronage avoid any risk of corruption.



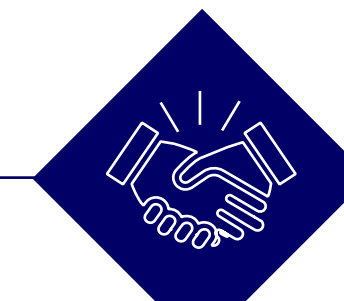
At FDJ UNITED, we promote cultural, educational, environmental, and solidarity initiatives. We engage in transparent and constructive dialogue with public authorities.

These engagements take different forms:



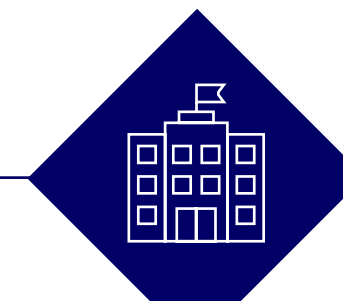
## Patronage

We provide financial or material support without compensation for actions of general interest (e.g., solidarity, culture, environment, research). This includes **the FDJ UNITED Foundation**. It supports projects of general interest, aimed at people in difficulty: economic, social and cultural disadvantage, disability, etc.



## Sponsorship

We support events or activities in exchange for visibility or marketing opportunities.



## Institutional relations and representation of interests (lobbying)

We communicate with public decision-makers to promote the Group's positions and understand society's constraints and expectations.

These actions may increase the risk of corruption. We strictly **supervise these practices**. We carry them out in full compliance with applicable laws, internal procedures, and our commitments to ethics and transparency.

**YOU MUST**

- ◆ Supervise all patronage, sponsorship, and institutional relations activities to prevent any risk of corruption.
- ◆ Follow the rules for declaring and managing conflicts of interest, including when sponsoring and supporting events.
- ◆ Ensure your political activities remain separate from FDJ UNITED.
- ◆ Know and apply all procedures that enable you to act fully in compliance with the Anti-Corruption Code of Conduct.

**YOU MUST NOT**

- ◆ Create a conflict of interest.
- ◆ Carry out any operation that gives or appears to give an undue advantage.
- ◆ Fund political parties, directly or indirectly, in the name of FDJ UNITED.

**GOOD PRACTICES**

**A Foundation official accepts a personal benefit in exchange for approving funding. The organisation is known to lack integrity. Is this acceptable?**

No. Accepting any personal advantage in return for influencing funding decisions is a form of corruption and a conflict of interest. The official must act in the public interest and ensure all supported organisations meet ethical standards.

**I am in discussions with an elected councillor regarding authorization for a strategic project. He indicates to me that it would be a good idea for FDJ UNITED to “take part in” his re-election campaign. Is this permissible?**

No. FDJ UNITED strictly forbids the funding of political parties. Political preferences of any type must never be mentioned in a business context.



# PROTECTING OUR ASSETS

At FDJ UNITED, we protect our assets against misuse and fraud. This protection covers our confidential data about players as well as the integrity of our games. It also applies to sensitive financial information, which may qualify as inside information.

To preserve the trust of our players and stakeholders, we must combat all forms of corruption. This includes any fraudulent use of our assets. It also covers unacceptable communication, modification, or deletion of confidential information.

## YOU MUST

- ◆ Ensure the confidentiality of players' and employees' personal data to prevent any fraudulent use.
- ◆ Prevent conflicts of interest, fraud, and corruption risks, particularly in sensitive roles.
- ◆ Uphold the Group's reputation through exemplary behaviour at every stage of the player journey.
- ◆ Regularly train yourself to detect and prevent corruption risks.
- ◆ Keep any inside information confidential and comply with Market Abuse rules.
- ◆ Respect closed periods and insider list obligations in sensitive financial or strategic operations.

## YOU MUST NOT

- ◆ Accept any cash payment or an unjustified sum of money or equivalent (e.g., vouchers), in exchange for confidential or strategic information, regardless of the amount or context.
- ◆ Engage in any behaviour perceived as corrupt or fraudulent. This includes actions that compromise the integrity, fairness, or confidentiality of our activities. It also covers the misuse of inside or sensitive information, for example, during M&A processes or closed periods.
- ◆ Respond to any request or solicitation that could jeopardise the Group's reputation or harm the interests of big prize-winners.

## GOOD PRACTICES

**I consider selling information about lottery winners to third parties. Can I do that?**

No. Disclosing or selling confidential information is a serious breach of trust and data protection laws. It endangers players and the company's reputation, exposing you to severe disciplinary and legal consequences.

**I received a bribe in exchange for disclosing confidential financial information that could influence the stock price. Is this acceptable?**

No. Accepting or offering a benefit in exchange for confidential information is a misuse of a professional position and may represent an act of corruption and insider trading. It undermines trust, integrity, and fairness in our activities.



# 3

## Our responsibilities

- 22** Report an incident
- 24** Acting ethically daily
- 25** In case of violations of this Code
- 26** Definitions

# REPORT AN INCIDENT



Integrity and responsibility are central to our daily actions. If you observe a behaviour or conduct that is inappropriate or goes against our values, report it with confidence. Doing so protects your workplace, your colleagues, and the Group, while reinforcing our culture of integrity and ethics.

We have set up **FDJ UNITED Alert**, an external, independent, and entirely secure alert platform. The **Ethics & Anti-Corruption team** ensures that all alerts are handled consistently, 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 your status, entity, or country;
- Our external stakeholders (service providers, former employees, candidates, etc.).

It allows you to **report, in complete confidentiality, a situation** that constitutes a breach to\*:

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

\* non-exhaustive list.

**How to report an incident?**

**Use the online platform:**  
<https://fdjuned.integrityline.fr/>

This platform is:

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

**Discuss it with:**

The Ethics & Anti-Corruption team: ♦  
[conformite.ac@lfdj.com](mailto:conformite.ac@lfdj.com)

Your manager ♦

The Anti-Corruption relays ♦

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 and French law on whistleblower protection, you may also choose to raise your concern with the competent external authorities (a full list is annexed to Decree n°2022-1284).

THE ALERT PATH VIA THE FDJ UNITED ALERT PLATFORM



**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.

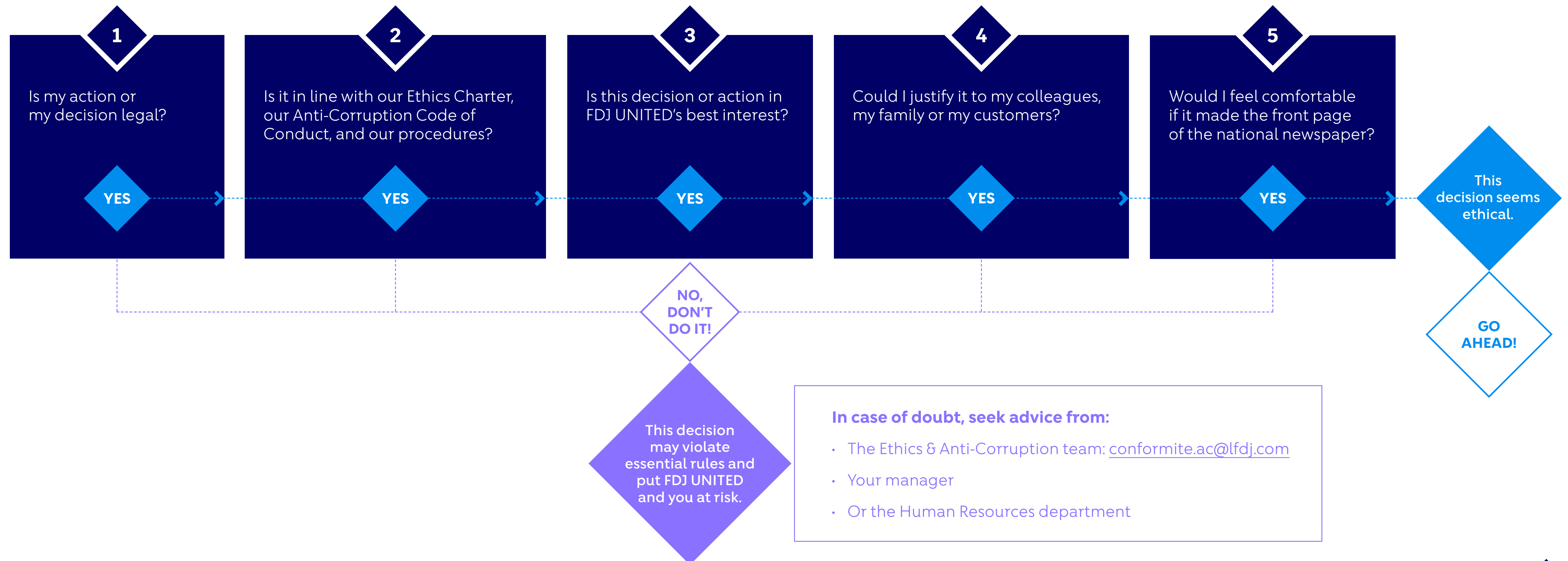
You may submit a report **anonymously**, but identifying yourself allows for more efficient handling.

This protection also extends to **facilitators**. Facilitators are individuals who assist the reporter in submitting the report, such as a manager, a union representative, or an NGO representative. The protection also covers individuals or legal entities connected to the reporter who might suffer retaliation.

# ACTING ETHICALLY DAILY

This Code cannot cover every situation we might face. While it focuses on preventing corruption, it is also important to remember that ethical dilemmas can arise in many other areas. We must then rely on our professional ethics. That includes using our judgment and common sense in day-to-day situations.

**BEFORE MAKING A DECISION OR ACTING, ASK YOURSELF THESE QUESTIONS:**



# IN CASE OF VIOLATION OF THIS CODE

This Code is attached to our Internal Regulations. Violating its rules and principles may lead to **serious consequences for employees, managers, or FDJ UNITED**.

**We require all FDJ UNITED employees and representatives to comply with this Anti-Corruption Code of Conduct and the associated procedures.** Managers must lead by example, ensure the Code is well understood, and promote a culture of trust and open dialogue.

In the event of a violation, FDJ UNITED is exposed to:

- Financial and criminal penalties
- Trade restrictions
- Reputational damage
- Harm to contractual relationships

Employees are liable to penalties:

- Criminal or civil (such as fines, imprisonment)
- Disciplinary actions (including dismissal)



# DEFINITIONS

## Bribe

An undue offer or advantage (cash, gifts, travel, job offer, etc.) in exchange for a favourable decision.

## Influence peddling

The act of monetising one's real or supposed influence (or promising to do so), to obtain or facilitate the obtaining of a favourable decision from an administration (public contract, public employment, etc.).

## Corruption

The act of promising, giving to a third party, soliciting or receiving, directly or through a third party, an undue advantage for oneself or others, to facilitate, perform or refrain from performing an act falling within the scope of one's function. It can be private (between two private actors) or public (involving a public official).

## Public official

Anyone performing a public function, especially those holding public authority, tasked with a public service mission, or elected to public office. For example, it can be a mayor, an employee of a national gaming regulator or an agent at the counter of an administration.

## Facilitation payment

The act of paying small, unofficial amounts of money to speed up or secure a public decision (obtaining a permit, administrative authorisation, etc.). Also known as baksheesh.

## Third party

Refers to any natural or legal person contractually bound to the FDJ UNITED Group. This can be a supplier, subcontractor, service provider, customer, intermediary, business or sports partner, a company in which we hold shares, a joint venture, or any other relevant entity.

# FDJ UNITED

## FDJ UNITED HEADQUARTERS

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January 2026

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