



# Climate Policy

July 2025

FDJ UNITED CLIMATE POLICY

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1. CLIMATE CHALLENGES AND AMBITIONS OF FDJ UNITED


Climate change represents a major global challenge, requiring urgent and ambitious action to limit greenhouse gas emissions. International commitments, such as the Paris Agreement, call for capping global warming at 1.5°C in order to mitigate the associated environmental and social impacts.

FDJ UNITED acknowledges the urgency of the climate transition. As a leading economic player, it is fully committed to reducing its own climate impact while contributing to the collective effort to achieve global climate objectives.

Accordingly, FDJ UNITED has set the following ambitions:

- ◇ To reduce carbon footprint across its entire value chain by engaging employees, partners, and suppliers;
- ◇ To make a meaningful contribution to the fight against climate change and take a leadership role in its industry,;
- ◇ To strengthen the resilience of all operations and the entire value chain in response to climate-related risks.

FDJ UNITED is taking concrete action to support the United Nations Sustainable Development Goals (SDGs), with a particular focus on Goal 13: Climate Action.

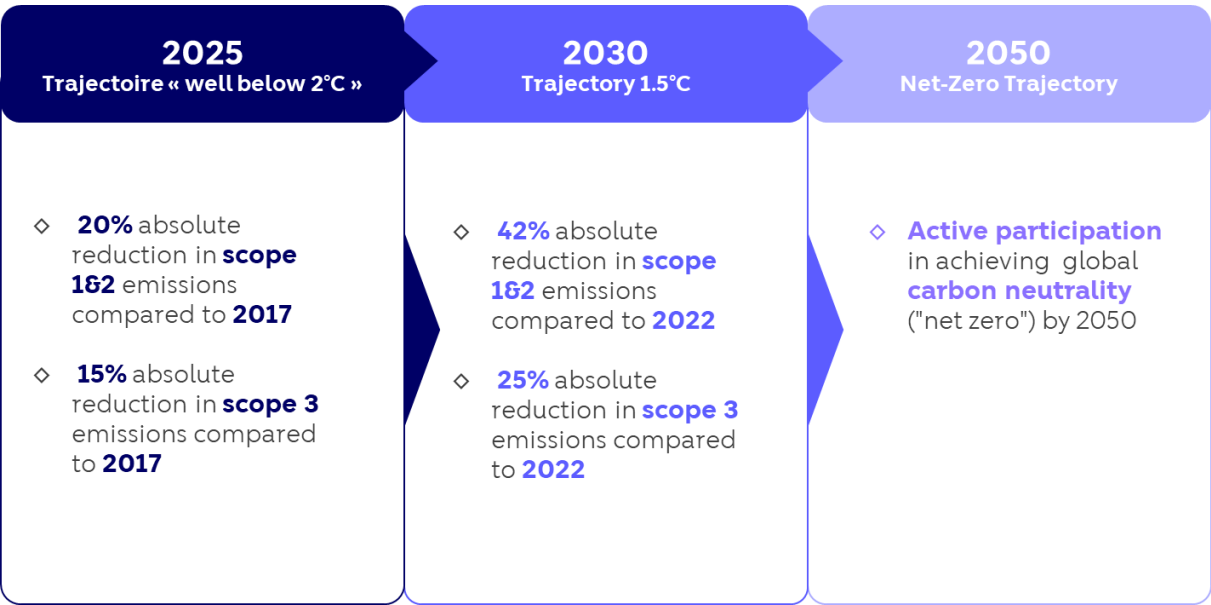
SDG 13: CLIMATE ACTION		
	<p><b>Take urgent action to combat climate change and its impacts.</b></p> <p>Target 13.2: integrate climate change measures into national policies, strategies and planning.</p>	<p><b>Limit the impact of the Group's activity on the environment: align the Group's greenhouse gas emissions with the 2°C objective and achieve carbon neutrality.</b></p>

2. COMMITMENTS AND OBJECTIVES

Since 2008, FDJ UNITED has been conducting carbon assessments to monitor the greenhouse gas emissions generated by its activities and to strengthen the emissions reduction strategy in place. To ensure consistent progress tracking, this carbon accounting exercise became an annual practice in 2017. The assessments are carried out in accordance with the methodologies of the GHG Protocol, covering all three scopes (1, 2, and 3).

In line with scientific recommendations<sup>1</sup>, international agreements (notably the Paris Agreement adopted at COP21 in 2015), and the main applicable regulations (including the European Green Deal, the Corporate Sustainability Reporting Directive – CSRD, and French legislation), FDJ UNITED has set ambitious and phased targets to reduce its greenhouse gas emissions over the short, medium, and long term.

Decarbonisation commitments of FDJ UNITED



<sup>1</sup> These recommendations include the works of the IPCC, which aim to limit global warming to +1.5°C compared to pre-industrial levels. This objective, set out in the Paris Agreement, is essential to minimizing the impacts of climate change. In the absence of such progress, a maximum increase of +2°C is regarded as a critical threshold.

### 3. A GOVERNANCE STRUCTURE DEDICATED TO CLIMATE ISSUES

The Climate Policy of FDJ UNITED, a pillar of the sustainability strategy, is fully integrated into the corporate governance. To ensure the effectiveness and long-term viability of their climate commitments, a dedicated governance framework has been established to address carbon-related issues.

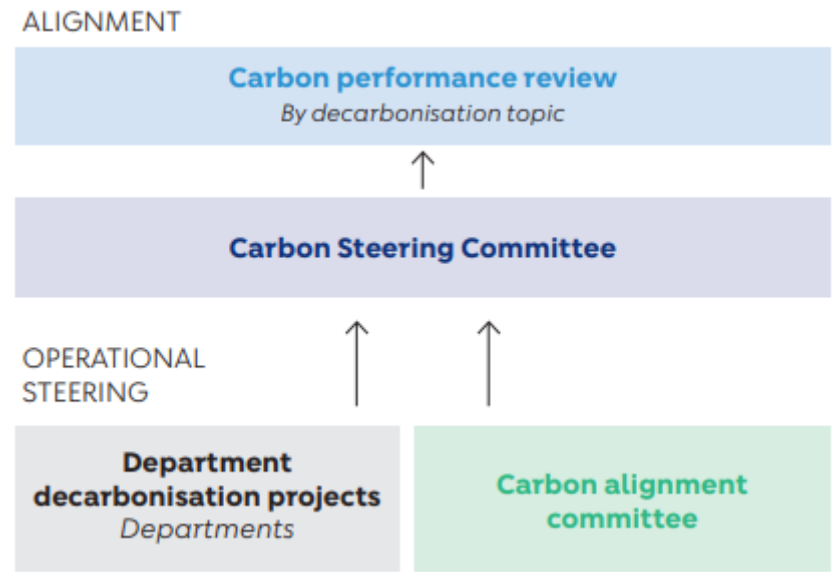
FDJ UNITED's Climate Policy, sponsored by the Deputy Chief Executive Officer, is operationally led by the Sustainability Department, together with the ESG team, and is intended to be rolled out across all subsidiaries.

To enable both operational management and strategic alignment of decarbonisation initiatives, FDJ UNITED has established a governance structure (comitology) specifically devoted to carbon issues, structured as follows:

- ◆ A Strategic Sustainability Committee, a sub-body of the Board of Directors, which oversees the implementation of the Group's commitments and the consistency of the ESG strategy. It is notably responsible for ensuring the proper deployment of the Climate Policy and the achievement of targets set during quarterly performance reviews.
- ◆ A Carbon Steering Committee, composed of representatives from the ESG teams, Responsible Procurement, and Performance Management, conducts semi-annual monitoring of the projects carried out under the Group's Climate Strategy.
- ◆ Carbon Performance Committees, held quarterly in the presence of the Chairwoman and Chief Executive Officer, the Deputy Chief Executive Officer, and the Chief Financial Officer/Strategy and Performance leader, are intended to regularly track progress on the decarbonisation plan and adjust the associated action plans accordingly.

The operational deployment of the Climate policy is structured around Business Line Decarbonisation Projects and a Carbon Alignment Committee.

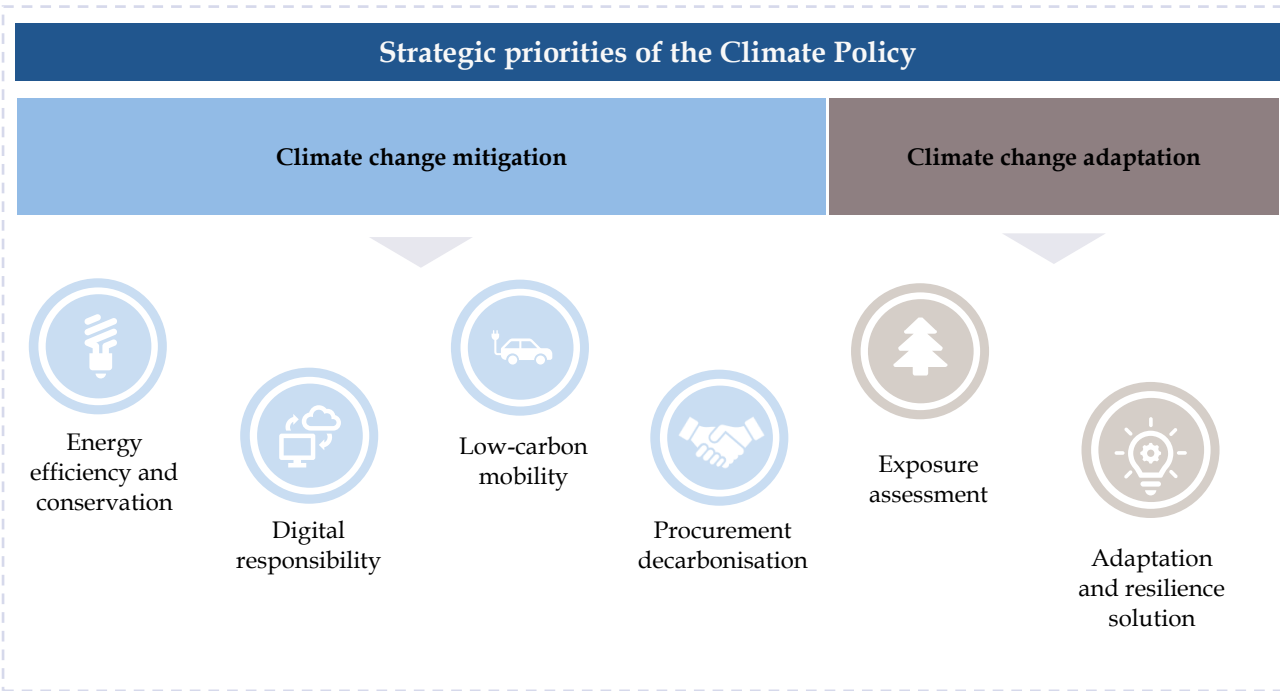
Dedicated governance structure on carbon-related matters



4. MEASURES IMPLEMENTED BY THE GROUP TO ADDRESS THESE CHALLENGES

Fully aware of its carbon footprint, FDJ UNITED has defined a Climate Policy based on an assessment of their greenhouse gas emissions and structured around an approach that addresses both climate change mitigation and climate change adaptation.

Climate policy priorities

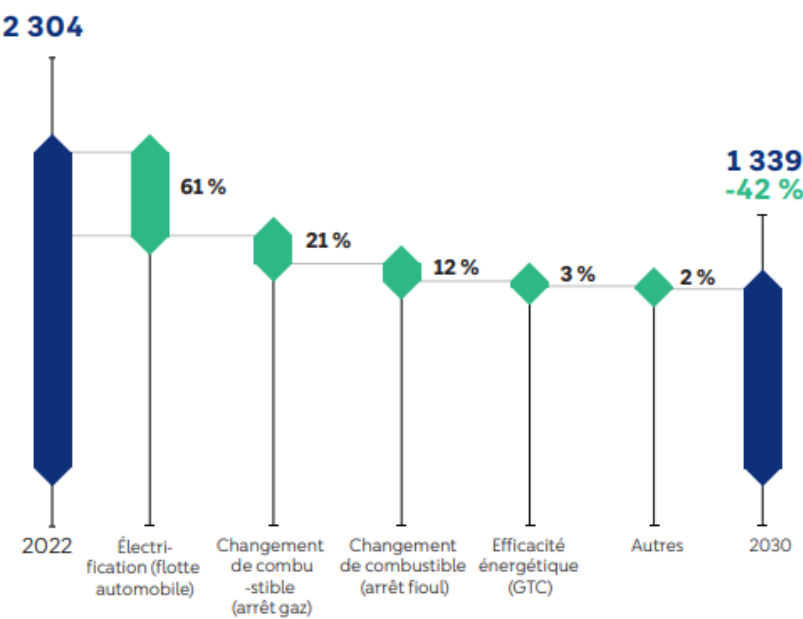


4.1. CLIMATE CHANGE MITIGATION

**Objective** → Reduce the Group’s carbon footprint.

FDJ UNITED has committed to significantly reducing its direct and indirect greenhouse gas emissions over the short (2025), medium (2030), and long term (2050). To this end, a decarbonisation trajectory has been established, covering both the Group’s own operations and the supply chain. This trajectory is part of a transition plan that enables the Group to monitor progress in the initiatives undertaken.

**Projection of the impact of the various decarbonisation levers on total GHG emissions for Scopes 1 & 2 (market-based) and Scope 3.3 (upstream energy) by 2030, compared to 2022 (scope: La Française des Jeux, excluding acquisitions).**



In addition, FDJ UNITED has voluntarily adopted an internal carbon pricing mechanism to assess the economic cost associated with its greenhouse gas emissions, aiming at broadening the scope of its strategic and operational decision-making. This mechanism supports the Group’s decarbonisation strategy by strengthening the analysis of investment projects, in particular through the integration of additional or avoided carbon-related costs.

Finally, as a reflection of the Group’s top-level commitment, the allocation of compensation to executive corporate officers, senior executives, managers, and all

employees is partly contingent on the achievement of a performance criterion related to the reduction of carbon emissions.

#### 4.1.1. Energy efficiency and conservation

Energy efficiency is a key lever in FDJ UNITED's policy to limit its environmental impact. In a context of growing pressure on resources, the Group views energy sobriety as both an opportunity and a responsibility.

The Group takes a proactive approach to optimizing its energy consumption, with a focus on the continuous improvement of the efficiency of infrastructures, systems, and equipment.

*Since 2022, the Group has rolled out an energy-sobriety plan structured around three main pillars:*

- *Reducing building-related energy use by adjusting building temperature settings and optimizing lighting;*
- *Reducing the energy consumption of digital activities;*
- *Reducing energy consumption associated with travel.*

Moreover, in compliance with the French Tertiary Decree<sup>2</sup>, FDJ UNITED is on a trajectory to reduce energy consumption by 40% by 2030 within metropolitan France.

#### 4.1.2. Digital responsibility

The digital sector accounts for over 4% of global greenhouse gas emissions (The Shift Project, 2019)<sup>3</sup> and requires significant physical resources. As a digital player, FDJ UNITED acknowledges the environmental impact that may result from their digital activities.

<sup>2</sup> Decree No. 2019-771 of 23 July 2019, known as the "Tertiary Decree", issued pursuant to the ELAN Law of 23 November 2018.

<sup>3</sup> The Shift Project. (2019). *Lean ICT – Pour une sobriété numérique*. <https://theshiftproject.org/article/lean-ict-rapport/>



To address this issue, FDJ UNITED has committed to reducing digital environmental and social footprint. This ambition is reflected in the rollout of a dedicated digital responsibility roadmap, which guides the actions of the Group.

The four strategic pillars of digital responsibility:

- **Govern, measure, manage:** integrate digital responsibility into corporate governance and measure the carbon footprint of the IT system.
- **Train, communicate** train teams in digital responsibility and communicate internally and externally on the actions taken.
- **Choose, involve:** implement a decarbonisation roadmap for IT procurement and select partners, suppliers, and technologies based on an environmental "best-in-class" approach.
- **Share:** share feedback, tools, and methods across all entities within the Group.

FDJ UNITED is also a member of the French Tech Corporate Community, which aims to foster concrete initiatives and joint projects among major companies on digital-related topics. In April 2024, FDJ UNITED signed the "Rules of digital use for digital sobriety" charter, in line with their commitment to environmental preservation.

*In 2019, in partnership with WWF France, FDJ UNITED took part in the WeGreenIT study. This initiative enabled the Group to assess the impact of the IT equipment and identify the necessary reduction measures. Several actions have been implemented and are still underway:*

*For data centers:*

- *Improving energy efficiency;*
- *Increasing physical server density.*

*For employees' IT equipment:*

- *Extending the lifespan of devices;*
- *Repairing IT hardware;*
- *Purchasing "TCO Certified" equipment.*

## 4.1.3. Low-carbon mobility

Low-carbon mobility is an essential lever to limit global warming to 1.5°C by the end of the century. In this context, the Group is working to promote more responsible travel practices, aligned with ecological transition goals and the preservation of natural resources. Accordingly, FDJ UNITED is taking steps to evolve its practices in terms of business travel and fleet management.

*FDJ UNITED encourages remote working to reduce employee travel, while progressively transitioning the vehicle fleet to electric models.*

## 4.1.4. Procurement decarbonisation

FDJ UNITED has made decarbonisation a priority within its procurement strategy, notably through the #BuyForGood program launched in 2023. This program aims to reduce carbon emissions generated by the Group's suppliers by promoting sustainable practices and working in collaboration with their partners to develop appropriate solutions.

*FDJ UNITED is bringing its supplier ecosystem on board through four key projects:*

- *Collecting carbon data related to the purchase of goods and services from the Group's main suppliers;*
- *Including a carbon clause in major contracts systematically to maximize carbon performance;*
- *Developing emission reduction plans for the most carbon-intensive procurement categories;*
- *Strengthening communication on the progress made with both internal and external stakeholders.*

## 4.2. Climate change adaptation

**Objective** → Strengthen the resilience of the Group's operations and assets to climate-related risks.

In view of the worsening consequences of climate change – in particular the growing frequency and intensity of natural hazards (heatwaves, floods, storms, droughts, wildfires, etc.) – FDJ UNITED considers that an adaptive approach, complementary to the reduction of greenhouse gas emissions and applicable to both current and future climates, is essential in order to reduce the exposure and manage vulnerabilities to climate risks.

To this end, FDJ UNITED has defined an analytical framework that enables to perform assessments on the exposure to both physical and transition risks, and to identify suitable adaptation solutions to safeguard the continuity and long-term resilience of the operations.

### 4.2.1. Identification and analysis of climate risks and opportunities

In order to assess the exposure to climate change, and in alignment with the recommendations of the Task Force on Climate-related Financial Disclosures (TCFD), FDJ UNITED has developed a climate risk and opportunity mapping that covers its own operations, supply chain, and downstream activities. This analysis is based on recognized scenarios, such as "IEA SDS<sup>4</sup>" for transition risks, and the RCP 2.6 and RCP 8.5 reference scenarios<sup>5</sup> developed by the IPCC (Intergovernmental Panel on Climate Change) for physical risks. These scenarios provide a forward-looking perspective on the potential impacts of climate change.

<sup>4</sup> The Sustainable Development Scenario (SDS) of the IEA outlines a pathway for the global energy sector (through 2040) that keeps the world on track to meet the long-term mitigation objectives of the Paris Agreement, while ensuring universal access to modern energy and significantly reducing air pollution.

<sup>5</sup> The "RCP" (Representative Concentration Pathways) scenarios describe different levels of greenhouse gas concentrations in the atmosphere and their impacts on the climate. "RCP 2.6" corresponds to an optimistic scenario in which significant emission reduction efforts succeed in limiting global warming to around 2°C. Conversely, "RCP 8.5" represents a pessimistic scenario, characterized by a lack of mitigation efforts and a sharp increase in the global average temperature, potentially exceeding 4°C by 2100.

*In 2024, FDJ UNITED acquired a climate risk and opportunity assessment tool in order to broaden the analysis across the entire value chain. This tool enables the modelling of both physical and transition risks under various climate scenarios, while also assessing their potential financial impacts.*

## 4.2.2. Development of adaptation and resilience

Based on this in-depth risk analysis, FDJ UNITED identifies adaptation and resilience solutions designed to protect its exposed assets and ensure the continuity of its operations.

## 5. AWARENESS-RAISING AMONG EMPLOYEES AND STAKEHOLDERS

Convinced that the success of climate transition depends on collective engagement, FDJ UNITED places great importance on raising awareness and mobilizing employees, suppliers and partners. The aim is to create a collective dynamic in which each actor, whether internal or external, contributes to the climate transition:

- **Employees:** FDJ UNITED is committed to raising awareness among employees about climate issues throughout their career path, in particular through onboarding programs, training plans and collective actions.

*Initiatives are regularly offered to employees to strengthen their understanding of climate change issues, such as the rollout of MOOCs, the organization of Climate Fresk workshops, or interactive awareness-raising sessions on decarbonisation.*

- **Suppliers:** Aware of the importance of the supply chain in reducing carbon footprint, FDJ UNITED regularly raises awareness among its supplier ecosystem about decarbonisation issues, while supporting them in their own efforts. The Group requires suppliers to define progress plans, challenges them on their climate objectives, and assists them in improving their ESG ratings.

*Several events and meetings, such as the FDJ UNITED Suppliers Day and roundtable discussions, enable FDJ UNITED to develop constructive dialogue with the suppliers and strategic partners.*

- **Partners:** FDJ UNITED works closely with its strategic partners to scale up climate action across the sector, including through participation in international coalitions and climate initiatives.

*FDJ UNITED is an active participant in the “Sustainability & Responsible Gaming” working group of the European Lotteries.*