



# GROUP ANTI- FRAUD POLICY



**FDJ UNITED** 



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This policy aims to protect the FDJ UNITED Group against any risk of internal and external fraud, while strengthening a culture of integrity and ethics within the organisation.

It applies to all Group employees and provides a reference framework for external partners (retail network, suppliers, service providers), in accordance with contractual and regulatory commitments.

It also covers fraud risks likely to involve third parties, including players, in the context of their interactions with the Group's offers and services.

The main objectives of this policy are as follows:

**Promote a culture of integrity and accountability**

The policy clarifies expectations regarding professional conduct and makes each employee accountable by raising awareness of their role in preventing and detecting fraudulent behaviors. It also encourages employees to proactively report any suspicious or fraudulent activity by providing secure and confidential reporting channels.

**Prevent, detect and handle suspected fraud**

The policy aims to ensure the effectiveness of fraud prevention, detection and handling arrangements. This includes regular monitoring of the measures in place, ongoing assessment of their relevance, and adjustments to controls to ensure an appropriate and proportionate response to each situation. The objective is to prevent fraud effectively, quickly identify suspicious behaviors and handle incidents rigorously.

**Ensure compliance with laws and regulations**

The policy ensures that the FDJ UNITED Group strictly complies with all laws, regulations and industry standards relating to anti-fraud, both nationally and internationally. Compliance with best practices in risk management and governance is a priority, helping to ensure adherence to applicable legal frameworks.



Like any organisation, the FDJ UNITED Group is exposed to fraud risks of internal or external origin, including those resulting from collusion between internal and external actors. These risks may involve third parties such as the distribution network, suppliers, service providers, players or any other stakeholder.

Gaming activities are based on the trust of players, partners and regulatory authorities and therefore require a high level of integrity and risk control. As one of the leading lottery, gaming and betting operators in the world, the Group has a responsibility to protect its players, its distribution network and its employees, to ensure the integrity of its operations and to preserve its reputation.

Fraud is defined within the Group as:

***« A deliberate act or deliberate omission intended to deceive one or more third parties, in order to obtain an illegitimate benefit, generally financial, with the intention of evading the laws, regulations and internal rules of the Group».***

Fraud has three inseparable components:

1. The deliberate and intentional nature of fraud, which distinguishes it from error or simple negligence.
2. Deliberate deception, characterised by concealment and/or abuse of position and/or breach of trust, committed in violation of the law or regulations.
3. The gain sought by the fraudster—material or moral—obtained directly or indirectly, for their own benefit or for the benefit of a third party.



## Forms of fraud

Fraud risk may notably take the following forms:

- Misappropriation of funds (false invoices, cheque or cash manipulation, etc.).
- Theft or destruction of assets belonging to the company (supplies, equipment, data, etc.).
- False statements (fictitious expense claims, undeclared absences, falsified indicators, etc.).
- Accounting fraud or falsification of financial and non-financial information (manipulating accounts to conceal losses or artificially increase results, presenting forged financial documents to deceive shareholders or regulators, altering data to meet laws and regulations or artificially improve financial or non-financial ratings, etc.).
- Conflicts of interest and corruption (accepting bribes in exchange for awarding contracts to suppliers or subcontractors, favoritism towards business partners in which an employee has undisclosed financial interests, etc.).
- Cyber fraud (hacking information systems to access sensitive data and resell it, modifying files or databases to conceal fraud or misappropriate funds, etc.).



## Risks specific to gaming activities

As a lottery, gaming and betting operator in France and internationally, and operating diversified activities, the FDJ United Group is exposed to various types of fraud that may affect all of its business activities, and in particular:

### 1. Gaming-related risks:

These relate to situations likely to impair the integrity of operations or game outcomes, including :

- Manipulation or attempted manipulation of betting events.
- Collusion practices between participants.
- Use of automated or diverted means (bots, scripts) in gaming operations.
- Any action aimed at circumventing game rules for fraudulent purposes (exploiting vulnerabilities, prize fraud, falsification of results or equipment).

### 2. Risks related to payment methods or identity documents:

- Opening player accounts or providing identity evidence using documents suspected of being counterfeit, stolen identity or forged.
- Deposits or payments made using payment methods suspected of theft or misuse.
- Promotion abuse.



## Group Governance

The Group's anti-fraud arrangements rely on structured governance, built around the **Group Audit and Risk Committee**, the oversight and supervision body responsible for ensuring the effectiveness of the risk management framework, including fraud risks. It regularly reviews the results of fraud prevention, detection and handling actions, assesses major incidents, and ensures the adequacy of resources and strategic directions for anti-fraud efforts.

## Operational steering

Operationally, the **Audit, Risk, Compliance and Security Department (DARCS)** drives the anti-fraud approach through a dedicated **Steering Committee**, responsible for setting directions, coordinating actions and ensuring regular monitoring of incidents and remediation plans. This committee brings together the relevant stakeholders (risk, security, legal, business lines, etc.), thereby ensuring a cross-functional and consistent view of anti-fraud efforts across the Group.



## Fraud Risk Assessment

Fraud prevention and detection rely on a rigorous approach tailored to the specificities of gaming-related activities, as well as to the evolution of the Group's scope of business, including the development of diversified services, international expansion and the growth of digital channels. These transformations expose the company to new risks requiring continuous adaptation of fraud control arrangements.

A fraud risk assessment is prepared and updated on a regular basis, and an action plan is formalised for the most significant risks. This assessment is carried out by each fraud domain owner, based on the risk analysis methodology defined at Group level. This approach ensures harmonised practices across all Group entities and subsidiaries by providing a common and consistent structure for identifying, assessing and managing fraud risks. Thanks to this methodology, the company has a shared and aligned view of risks, facilitating collaboration and the implementation of effective action plans adapted to the specificities of each activity.



## Prevention and Detection Mechanism

The Group has implemented mechanisms designed to prevent and detect fraud risks across all of its activities, whether carried out at physical points of sale or online. These mechanisms form part of an overall risk management framework and aim to protect customers, preserve the integrity of operations and secure assets.

Activities carried out at physical points of sale are governed by processes designed to ensure the integrity of partners and compliance with applicable rules. The authorisations required to carry out activities are granted following prior checks, including on the partners' probity and the origin of funds, and are subject to regular controls intended to detect possible anomalies or fraudulent practices (notably in France, through a dedicated network of inspectors). Appropriate customer identification measures and monitoring of sensitive transactions are implemented in accordance with applicable regulatory requirements.

Online activities rely on customer registration and verification processes, including identity validation and account certification measures.

Atypical transactions and behaviours are subject to ongoing monitoring using appropriate tools and automated alert mechanisms, by specialised teams, and may lead to precautionary measures or legal action in the event of proven fraud.

The Group has an internal control framework covering all of its entities. This framework relies in particular on segregation of duties, appropriate validation workflows, IT security measures and periodic controls. It is regularly assessed by control functions and Internal Audit in order to evaluate its effectiveness and adjust it in line with evolving risks.

Finally, training and awareness-raising actions help maintain a high level of vigilance, notably for employees, partner retailers and players.



The FDJ United Group provides several reporting channels enabling employees, players, partners, suppliers and other stakeholders to report fraud-related matters or suspicious behaviours. These arrangements are designed to ensure the security of the information shared. The main channels available are:

- The Group has set up a secure platform accessible to all employees and external stakeholders (\*) to raise any report or any matter that may run counter to the Group's ethical and compliance commitments and principles. This platform ensures the confidentiality of the information provided and enables secure follow-up of the report's progress. The platform is available at: <https://fdjuned.integrityline.fr/>

(\*) *excluding players, who can raise any concern related to a game via: [www.fdj.fr/infos/faq](http://www.fdj.fr/infos/faq)*

- Employees may also report fraud matters directly to the Security or Internal Control teams, which are trained to handle such reports confidentially and rigorously.
- In case of emergency, particularly outside business hours, a Crisis Management team is activated to handle critical or urgent fraud reports. This dedicated team, reachable at any time, follows a specific protocol to immediately address major incidents and limit potential impacts on the company and its stakeholders. The Group ensures that resources are always available to respond quickly and effectively to any emergency situation, thereby ensuring continuity in anti-fraud efforts.



The FDJ United Group investigation process is based on a systematic assessment of potential fraud incidents, performed by specialised teams such as internal control, security, compliance or risk management. This assessment makes it possible to quickly determine the severity level of each incident. Critical incidents are escalated to the Group investigation team for in-depth review, while minor incidents may be handled directly by the operational teams responsible for anti-fraud activities, in accordance with applicable procedures. Regardless of criticality, immediate measures are implemented to limit damage, preserve evidence and protect the Group's assets.

The Group investigation team is responsible for leading or performing investigations that are escalated to it, in collaboration with internal and external expert teams where necessary. It ensures that each investigation is conducted in accordance with internal procedures and applicable local regulations.

In the event of confirmed fraud, the individuals involved—whether employees, players, partners or any other stakeholder—may be subject to sanctions in accordance with local legislation, including disciplinary, civil and/or criminal sanctions. Depending on the seriousness of the facts, the Group may also cooperate with the competent authorities to initiate any legal action that may be required.

**April 2026**

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