

## Flutter Entertainment plc Modern Slavery Statement 2021

Flutter Entertainment is a global sports betting and gaming operator with a portfolio of leading international brands and operations. We believe in bringing entertainment to life for our customers in a safe, responsible, and sustainable way. We work hard to deliver a vibrant and safe sports betting and gaming experience to our customers around the world. Our operations range from sports bookmaking to gaming, with exchanges, poker, fantasy sports, and B2B in between.

### Our commitment to preventing modern slavery

At Flutter, we recognise that modern slavery is a global threat that imposes an intolerable burden on those affected by it and that every step must be taken to reduce the suffering it causes. It is incumbent on all organisations to ensure that their operations remain free from this invidious practice. We are committed to conducting our relationships to the highest ethical and moral standards and acting with integrity and professionalism in all our activities.

### Scope and coverage of this statement

This statement has been published in accordance with the Modern Slavery Act 2015 (the “Act”). It sets out the steps taken by Flutter Entertainment plc and our subsidiaries during the year ending 31 March 2021 to prevent modern slavery and human trafficking in our business and supply chains.

This statement has been approved and adopted by the Board of Flutter Entertainment plc, as well as each of the Group’s subsidiaries that meet this requirement under the Act (as set out in the Appendix).

As part of our commitment to improving our performance by sharing best practice across our businesses we assess, monitor and mitigate risks relating to slavery and human trafficking on a Group-wide basis, with individual divisions and operating companies taking specific actions where appropriate to the level of risk. In line with this, our statement also applies to all our businesses which are not legally required to make a statement under the Act, regardless of their location, size or turnover.

### Overview of our structure, operations and supply chain in 2021

Flutter Entertainment PLC is headquartered in Dublin and employs more than 14,000 people globally. We have organised our business into four divisions whose activities and brands are summarised below:

#### UK & Ireland

We operate some of the most popular sports betting and gaming brands in the UK&I market. Sky Betting & Gaming, Paddy Power and Betfair offer market leading innovation to millions of customers every week.

Although the brands mostly operate online, this division also includes a network of Paddy Power betting shops in the UK and Ireland.

#### Australia

The Sportsbet brand is the market leader in online sports betting across Australia. Sportsbet combines innovative, easy to use products and high levels of targeted promotional generosity to form a leading customer proposition.

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### International

Flutter International operates in a number of territories around the world, led by its flagship brand, PokerStars, the world's largest online poker site. The division also includes PokerStars Casino, PokerStars Sports, Betfair International, Adjarabet and Junglee Games.

Flutter International operates under licence in 19 territories across the globe and has customers in over 100 countries.

### US

Our US division consists of FanDuel, FOX Bet, TVG, PokerStars and Betfair US. The division has a diverse product offering of online and retail sportsbooks, online gaming, poker, advanced deposit wagering on horse racing and TV broadcasting. FanDuel is the market leading online sportsbook and casino operator in the rapidly expanding US market and is well positioned to continue to take advantage of this opportunity.

Across our operations, Flutter has a high proportion of colleagues performing highly skilled roles. The majority of our employees are based at offices in Ireland, UK, Isle of Man, Malta, Australia, US, Romania, Portugal, Italy, India, Bulgaria and Georgia. The remainder of our colleagues are based in our retail shops and kiosks in the UK, Ireland, Georgia and the US.

### Governance and due diligence

We invest significant time to put in place the appropriate processes, policies and governance structures that guide us in everything we do. Flutter recognises that modern slavery in all its forms is a complex problem with no single root cause which requires a holistic range of preventative measures. Our governance and diligence measures to mitigate risk of modern slavery and human trafficking include the following:

- Our **Code of Ethics** clearly states our commitment to ensure that we operate in a way that respects, protects and champions the human rights of all those who come into contact with our operations. The Code of Ethics contains specific provision in relation to identifying and reporting any risk or suspected incidence of modern slavery within the Group's operations.
- Following our merger with Stars Group in 2020, we have continued to develop, and rollout universal group policies supported by tools which allow us to monitor the effectiveness of policies in 2021. This year we introduced **Group Financial Crime Minimum Standards for third party relationship management**.
- Our **Procurement Policy** requires that, in assessing the suitability of a supplier or partner partnership, staff are directed to have specific regard to any risk of modern slavery within or posed by the new supplier.
- We have robust employee processes in place and conduct background and verification checks on all employees and contractors to mitigate the risk of slavery and trafficking. All new hires are subject to verification checks, including national ID/passport checks, education checks, and right to work documentation.
- Our **Employee Code of Conduct** encourages employees and contractors to identify and report any suspicions of modern slavery taking place.
- We also have a **Whistleblowing Policy** to ensure that employees and contractors can voice any concerns that they may have without fear of suffering any detrimental treatment.
- In 2021 we invested further in resource in our group functions and across compliance more generally to enable us to continue to review and enhance our policies and procedures across our global operations.

### Risk assessment and management

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Flutter operates an entertainment business that is predominantly online based, with some retail presence and live events in countries, generally at low risk of modern slavery. Most of our procurement spend is in skilled sectors with a similarly low-risk profile. We also abide by all relevant domestic employment legislation in the countries where our staff are employed.

We have made considerable progress in continuing to strengthen and develop our risk management processes and procedures during 2021. We recognise that, with the size and scale of our business, there is a risk that some suppliers may have issues deeper within their own supply chain. We will continue to monitor our suppliers for non-compliance with our commitment to preventing modern slavery and we will be particularly vigilant in relation to suppliers in higher-risk countries and sectors.

### Our supply chain

Flutter's supply chain is large, encompassing close to 12,000 suppliers globally. Most of our supply chain spend is in skilled sectors such as professional services, marketing, and information technology. The top countries of origin for our suppliers include the UK, Ireland, USA and Australia.

To date, thousands of entities and individuals in Flutter's supply chain have been screened for risks associated with modern slavery. 2019 saw us invest heavily in a new monitoring and reporting tool which we have been using throughout 2020 and 2021. In 2021 we continued to focus efforts on extending the tools we employ to more effectively screen our suppliers for risk or exposure to instances of forced labour and human trafficking. We extended the use of this tool this year to include monitoring of suppliers more broadly across the business, commensurate with their risk profile. The screening is not just performed on entities but can be extended to directors and beneficial owners. This allows us to screen new and existing suppliers more effectively against a range of harmful activities, including the risk of modern slavery within their operations. If a supplier is found to exhibit a risk of such practices in its operations, our procurement process requires immediate further investigation to take place with the outcome that the relationship be immediately terminated should any presence of slavery in the supplier's operations be confirmed.

None of the screenings have revealed any confirmed instances of modern slavery in relation to the screened parties in 2021. Additionally, there have been no calls regarding modern slavery to Flutter's confidential reporting mechanism outlined above in 2021. Flutter is committed to continuing to screen for such practices and will continue to be proactive in monitoring our business for breaches.

We have also expanded the reach of our Supplier Code of Conduct to include operations in the US and Australia. This code outlines our ethos and principles and sets out the standards of behaviour we expect from our suppliers. The updated code contains specific requirements in relation to modern slavery and will be communicated to all new and existing suppliers as its scope is extended.

### Training and reporting

Our **Code of Ethics was updated** in 2020 and was communicated to all employees at the beginning of 2021. The enhanced code of ethics training has been rolled out to all employees across our group functions and will be extended across divisions in 2022. Additionally, all HR staff are appropriately trained in the relevant procedures applicable to the risk of modern slavery in the recruitment process. Any material legal, operational or reputational issues can be reported via an international, independent, whistleblowing service. HR processes are in place to manage any risk in the recruitment process and escalate accordingly.

### Our future commitments

- To review and update our modern slavery statement every year in line with our commitment to ensuring that our business and supply chain remain free from any association with breaches of the Act;
- To continue to develop our policies and processes to ensure our approach remains commensurate with our risk profile; and
- To monitor changes in our business and in the environments in which we operate to capture and manage any new or evolving risks so that our zero-tolerance approach to modern slavery is maintained.

**Approved and signed on behalf of the Board of Flutter Entertainment Plc**  
December 2021

Peter Jackson  
**Group Chief Executive Officer**

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### **Appendix – UK Registered entities**

Betfair Limited  
Bonne Terre Limited  
Hestview Limited  
Fanduel Limited  
Power Leisure Bookmakers Ltd  
Halfords Media UK Ltd