

Our Code of Ethics...

A message from Peter Jackson, CEO of Flutter Entertainment PLC

Flutter is committed to conducting business honestly, fairly, and in accordance with the law throughout each of its divisions. As part of this commitment, all of our employees must avoid pursuing business opportunities that require them to compromise these standards. In order to ensure that we adhere to this commitment, all employees are required to adhere to both the letter and spirit of the Flutter Code of Ethics. The following sections below outline the key aspects of this document.

Protecting Our Players and Markets

Flutter takes the integrity of its markets extremely seriously and employs designated integrity teams whose remit includes monitoring and investigating any possible indications of fraud, money laundering, bribery or corruption. Flutter's pledge to protecting our players includes a high emphasis on Safer Gambling, which we aim to embed within our company's culture. In addition to this, we also ensure that we have strong controls in place to monitor all political donations to ensure a transparent process is in place at all times.

Living the Code:

Any employee who notices suspicious betting activity is required to report the concern to our Integrity team immediately.



Protecting Our People and Business

Flutter is aware that our culture is only as strong as the employees who live it. In order to ensure that our employees can successfully work in an environment that promotes dignity and respect, Flutter is committed to fostering a diverse and inclusive workforce with equal opportunities. As part of this endeavour, all of our employees are encouraged to participate in diversity and inclusion workshops, in order to help them gain a better understanding of the challenges that some of their colleagues may face and to ensure that employees are free to hold open discussions around such topics in order to gain the support they require.

Living the Code:

Flutter's newly constructed Head Office was specifically designed with accessibility for all employees in mind.

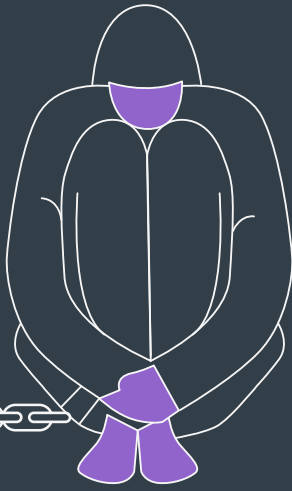


Protecting Our Data and Assets

As Flutter is required to hold a certain element of personal data for our customers, we understand that this task comes with a high level of responsibility to ensure that the data is kept safe and secure. In order to ensure that we meet our customers expectations, we maintain Data Protection Policies, and hold ourselves to the highest standards. If you have any queries around Data Protection at Flutter, you can contact the Flutter Group Data Protection Officer at DP@flutter.com.



Modern Slavery



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. More than 40 million people worldwide are estimated to live in slavery or are trafficked daily, though the total number may be even higher. It is complex in nature and the signs of it are not always easy to detect. It is incumbent on all organisations to ensure that their operations remain free from this invidious practice.

As a global operator, Flutter is committed to preventing slavery and human trafficking in all areas of our business and we expect the same commitment from our employees, contractors, suppliers, and business partners.

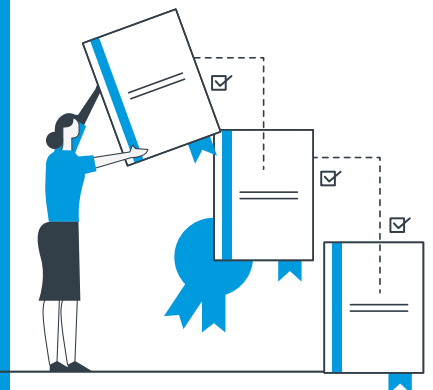
For more information on this, please see the following "Modern Slavery" link on our website (<https://www.flutter.com/operating-responsibly/modern-slavery-statement>).

Conflicts of Interests

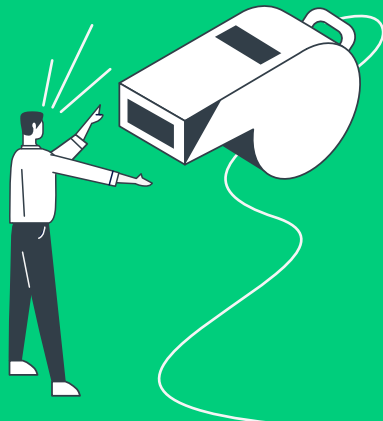
Flutter is aware that during our day-to-day business, Conflicts of Interest may arise amongst our staff as their personal and business lives may overlap. In order to adhere to the above commitment, all employees are expected to use good judgment, adhere to high ethical standards and avoid situations that may conflict, or appear to conflict, with the best interests of Flutter or the effective performance of their duties. In light of this, employees are expected to disclose any Conflicts of Interests such as (but not limited to) financial interests, outside business relationships, board or advisory memberships, gifts & hospitality and third parties. Flutter and Third Parties follow Flutter's Procurement procedures when employing the services of external suppliers to uphold Flutter's standards.

Living the Code:

Flutter has developed detailed processes in relation to how we manage our relationship with Third Parties Suppliers, to ensure that our high ethical standards are met.



Reporting



As part of our daily work, we aim to create and uphold a strong culture of support and openness in which our employees are able to speak their minds and speak up when they feel something is not right. As part of this endeavour, all employees are encouraged to report any known or suspected wrongdoing. In addition to being able to report concerns to line

managers and Human Resources, we also have a confidential reporting line set up, that is available 24/7 to all employees though which they may voice any concerns they may have. Our Whistleblower service has been promoted through specific campaigns which are widely distributed to ensure that all employees are aware of the channels available within the service.

In Summary

All Flutter Employees are expected to:

Act with integrity at all times, using good judgement and high ethical standards.

Not allow themselves to be influenced unduly by others who may not be acting in good faith.

Ensure that Safer Gambling is kept top of mind in all areas of our business.

Not condone unethical behaviour.

Avoid real or perceived Conflicts of Interests.

Not let personal benefit influence any decisions they make.

Report any concerns they become aware of.

Not ignore any wrongdoing and assume somebody else will report it.