



Due Diligence

Employees initiating charitable support in the name of Flutter must ensure due process is followed. Higher-risk categories have been identified for the potential misuse of funds or to our reputation. Donations should not be given to:

- Non-registered charities (subject to local legal requirements). Where registration is not required, the organisation must demonstrate non-profit status.
- Political parties, government bodies, or lobbying organisations. Any exception must be approved by local public affairs dept and documented.
- Organisations that promote religious beliefs or use of funding for religious instruction.
- Sponsorship for individuals or team fundraising challenges where funds are given to the individual/team.

Reporting & Record Keeping:

Each divisional, brand or location Do More Lead tracks donations and activities and must submit a quarterly report to the Group Head of Communities. All data must be entered into the group-designated tool and include:

- **Finance:** reconciled with local Finance departments to ensure accuracy.
- **Volunteering:** recorded through an approved tracking tool (HR system, OnHand or other verifiable data source).
- **Impact:** reported by partner charities wherever possible, with *people reached* recorded as a minimum.

III. Roles & Responsibilities

Divisional / Regional Company Management must:

- Appoint at least one Do More Lead. The individual/team can have a location, brand, regional or division wide remit as deemed appropriate.
- Ensure Leads have support to capture and consolidate Do More data. These mechanisms may vary locally but must meet group reporting standards.

- Social finance or Impact Investing.
- GoFundMe pages or equivalent.

All proposed charity partners must be onboarded by procurement and submitted against standard screening and checks for sanctions before donations are made. Additional local checks can be performed as deemed necessary, but minimum due diligence is required across the group.

Given industry sensitivities, organisations serving higher-risk demographics (e.g. children) should be avoided but where the partnership is deemed essential, the proposal should be escalated to divisional Do More Leads, Communications and Public/Government Affairs for approval.

Employees must provide donation and impact records to their divisional/brand Lead at the time of the donation. Evidence must be shared each quarter alongside data reports for audit purposes. Donations above \$25,000 or local equivalent are expected to have agreed impact reporting requirements with their partners in advance of any donation being made.

Local systems may supplement collection, but group reporting standards always apply. Records must be retained in line with Flutter's document retention schedule and be available for audit.

All employees (incl. Do More Leads) must:

- Follow this policy and supporting documents.
- Where participating in committees, comply with the local guidelines as agreed with the brand/regional/divisional Do More Lead.
- Not bypass divisional, regional or brand Leads or group processes, even when pursuing locally tailored initiatives.

IV. Monitoring, Assurance and Breach Reporting

Compliance with this policy is mandatory. On submission of data each quarter, local Do More leads should perform assurance checks before reporting to the Regional Leads. Divisional Leads are required to verify these checks ahead of submission to the Group Head of Communities. Additional sample checks will be carried out centrally, and Internal Audit may periodically review the data and evidence. Global reports

will be shared quarterly with Flutter ExCo, compliance, the Nevada Licensing Committee, and others as required.

Employees must raise any issues or concerns with managers or local compliance teams as soon as possible. Breaches can lead to disciplinary action up to termination. Misuse concerns may also be reported through whistleblowing channels.



VI. Relevant Contact Details

In the event of any questions with regards to the content, context or meaning of this document please contact:

Responsible	Email
Kerry McNally, Group Head of Communities & Engagement	Kerry.mcnally@flutter.com

VII. Supplementary Documentation

- Do More Policy Standard
- Minimum Standards for Third Party Relationship Management
- Anti-Bribery & Corruption Policy Standard
- Children and Communications Policy
- Blip Donations Policy
- FanDuel Do More Policy
- Flutter International Do More Procedures 2025