Flutter Entertainment plc

Flutter Entertainment: Group Tax Strategy

The Board has overall responsibility for ensuring that Flutter Entertainment PLC ('the Group') has in place appropriate systems of risk management and internal controls to identify, manage and mitigate the tax risks to the overall viability of the Group.

Day-to-day responsibility for the management of tax risk is delegated to the Group Tax Director, who reports to the Chief Financial Officer.

In addition, linked to the regulation of the Group's online and offline gaming activities, we have dedicated teams working with regulators and governments and our commitment to ensuring compliance with tax laws is supported through our transparent relationships with these bodies.

This document sets out the Group's tax contributions and approach to tax which is reviewed and updated annually.

The board has approved the Group's Tax Strategy for the year ended 31 December 2025 in accordance with Schedule 19 of the Finance Act 2016.

Our Objectives

The Group Tax Strategy objective is to ensure timeliness and accuracy of tax returns and payments, tax reporting and governance. The Group adopts a balanced approach in delivering value through commercially aligned tax planning, efficient structuring of commercial activities and M&A, alongside proactive management of tax risk areas. The Group aims to work collaboratively with Tax Authorities and to maintain an open and transparent relationship with them.

A Global Brand

The Group operates a range of global brands across 6 continents. The Group employs over 27,000 people across 80+ office locations and 1,150 retail sites, whilst offering products in over 100 countries and serving 13.9m average monthly players globally in 2024.

The Group's global tax contribution for 2024 was $5bn, reflecting our significant contribution to the global economies in which we operate.

In the first quarter of 2025, the Company updated its internal reporting to reflect the way the Company now manages operations and allocates resources. As a result, the Company now has two reportable segments; the US (comprising the FanDuel brand and unchanged from the US segment as reported in 2024) and International (which comprises of all other Flutter brands which were previously reported as our UKI, International and Australia segments):

- **US:** The US division contributed over **$1.9bn** in betting and gaming duties alone from a tax contribution of over **$2bn** in 2024.
- **International:** The International division contributed approximately **$3bn** in taxes in 2024 to various economies around the world.

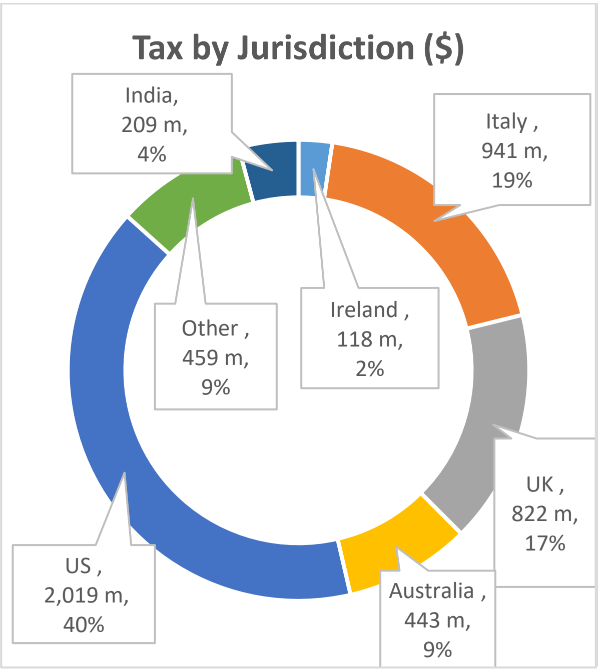
Tax Contribution

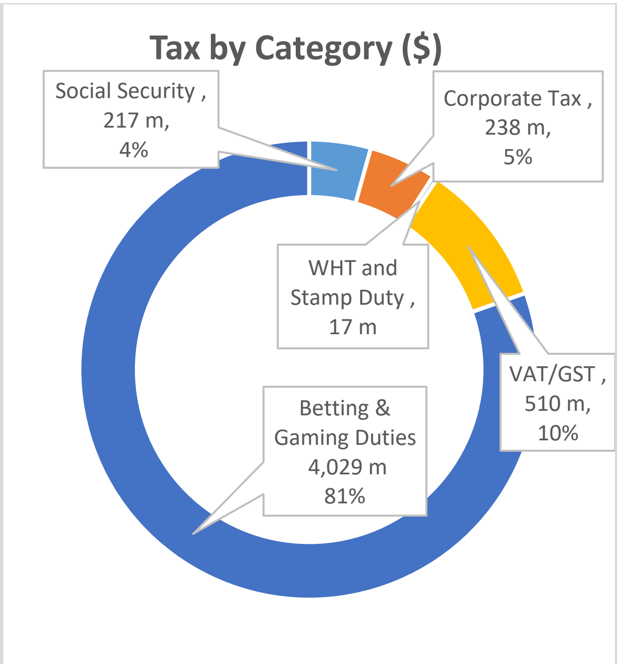
Tax is paid where the Group's economic activity takes place; with the top six tax paying jurisdictions being the US, the UK, Australia, India, Ireland and Italy. In addition, tax contributions are made to economies such as Georgia and Armenia, home to the Group's Adjarabet brands.

The Group is subject to a variety of taxes including Corporate taxes, Employment related taxes, Withholding taxes, Gaming and Betting duties and VAT/GST as described below:

- **Corporate Taxes**: Paid on the Group's profits in each of our taxable jurisdictions.
- **Employment Related Taxes:** Mainly social security taxes that the Group incurs as an employer.
- **Betting and Gaming Duties**: These taxes make up the greatest proportion of the Group's total tax contribution. Charged on the Group's revenues and generally paid based on customer location, in line with local regulations/legislation.
- **VAT/GST:** In some jurisdictions VAT/GST is charged on the Group's revenues. However, due to the VAT/GST exempt nature of betting & gaming, in other jurisdictions the VAT/GST charged on goods & services purchased by the Group is irrecoverable and is a cost to the Group.

The following charts provide a breakdown of the global tax contribution by tax jurisdiction and tax category:





Other Tax Contributions

The Group also **collects material amounts of taxes, of approximately $1.2bn in 2024**, on behalf of governments, from both our employees and our customers (including from the sale of lottery tickets).

The Group also paid approximately **$580m in Sporting levies in 2024**.

Effective Risk Management and Governance

The Board reviews and approves the Group's Tax Strategy annually. It has delegated the review of the adequacy and effectiveness of risk management to the Audit Committee and Risk and Sustainability Committee. The Audit Committee monitor the Group's tax risks and receive regular updates on the principal tax risks from the Group Tax Director.

The Group Tax Director leads a team of experienced tax professionals, primarily located across the UK and Ireland, with additional tax resource in other countries, including the US, Australia and Italy. The Group Tax department actively seeks to identify and manage tax risks to ensure they remain in line with our Policy objectives, undertaking an assessment of the key tax risks on an annual basis. These tax risks are managed, monitored and mitigated through the tax control framework, whereby key tax control risks are managed by the tax team, with annual testing of these controls undertaken by the internal audit team. The Group ensures that the tax team comprises of staff with the relevant qualifications and training to manage the Group's tax position. Where there is significant uncertainty or complexity in relation to a transaction or risk, advice is sought from third party advisors.

The Directors of the Group are also required to confirm annually within the Directors' Report that the Group has prepared a comprehensive compliance policy which is designed to secure compliance with regulations across several areas and that this policy is reviewed during the year by the appropriate individuals within the Group. This requirement is provided for under the Irish Companies Act 2014 and includes Tax among other areas of compliance. In addition, in accordance with the UK rules, the Group has nominated a Group Senior Accounting Officer who ensures that we have appropriate accounting arrangements in place to maintain robust tax compliance processes.

Responsible Attitude towards Tax Planning

The Group ensures that the profit split across the jurisdictions where it operates reflects the commercial reality and where value is created within the Group. This ensures that it correctly accounts for and pays the required taxes. The Group respects the tax laws of each jurisdiction in which it operates and interprets these in a way that it believes is in accordance with their policy intention.

The Group Tax department works closely with the business and is consulted on tax matters in relation to any new ventures, advising on preferred routes to minimise any tax risks and costs.

The Group seeks to be fully transparent in all our tax matters.

The Level of Risk we are Prepared to Accept

In line with the wider business, all decisions are made having regard to the Group's appetite towards risk.

The Group acknowledges that there is a level of risk as a result of the business and the locations it operates in and accordingly seeks to reduce these risks where appropriate. The Group looks to utilise tax reliefs and allowances where available but does not pursue aggressive tax planning opportunities that may arise.

Engaging with Tax Authorities

The Group has a good working relationship with local tax authorities. The Group discusses our tax affairs with openness and honesty and where possible, in advance of strategic decisions being made to minimise tax risk. Where applicable, it also discusses matters in advance with the relevant tax authority to obtain their opinion or approval.

Whilst the Group will not take an abusive tax position, it recognises that in some areas there will be differing legal interpretation and where this occurs, it will seek to engage with Tax Authorities to resolve any such matters for a collaborative conclusion.

Approved by the Board

April 2025