Flutter™

Conflict of Interest Policy

A message from Pádraig Ó Ríordáin, Chief Legal Officer & Group Commercial Director

"Building a culture where we operate responsibly, honestly, fairly and in accordance with the laws in each of the jurisdictions in which we operate is essential to us at Flutter. It is the responsibility of everyone at every level to help build and maintain this culture by being aware of, and understanding the risks that Conflict of Interests can bring to our business. This responsibility includes adhering to the requirements set out in this Policy. Thank you for taking the time to read and understand this Policy and for helping Flutter build and maintain a culture we can all be proud of."

I. Introduction, Scope and Purpose

Flutter Entertainment plc, and all of its subsidiaries ("Flutter"), is committed to conducting business honestly, fairly, and with respect for people in accordance with the law in each of the jurisdictions in which it operates.

This Policy applies to Flutter employees as well as board members, agency workers, volunteers, job applicants and independent contractors and third parties working on behalf of the company (hereinafter to be referred to as "you").

This Policy is approved by the Board Risk and Sustainability Committee (BRSC) or it's designate. It will be reviewed and updated on an annual basis and, if necessary, more frequently where regulations/business changes require it.

The purpose of this Policy is to outline:
   I. What a Conflict of Interest is;
   II. Our approach to managing Conflict of Interests throughout our business;
   III. What your responsibilities are to guiding against Conflict of Interest risks ; and
   IV. The steps you must follow when a possible or actual Conflict of Interest occurs.

This Policy is supported by the supplementary documentation outlined in section VI.

II. Statement of Policy

Key definitions

- **Conflict of Interest:** A Conflict of Interest occurs when a personal or self-serving interests could directly or indirectly compromise your judgement, decisions, or actions when working for or with Flutter. Such interests hold the potential to make it difficult for you to perform objectively and effectively on behalf of Flutter.

Our approach to Conflict of Interests

Flutter is committed to conducting its activities free from bias; however, we recognise that Conflict of Interests may arise from time to time. To help ensure that we remain objective in carrying out our duties, we have implemented the following:

   I. Policies, guidelines, and training to ensure we understand what a Conflict of Interest is, and what their roles and responsibilities are;
   II. Formal escalation and approval requirements for known Conflict of Interests;
   III. Frameworks and procedures designed to continuously monitor for conflicts of Interests risks in our global operations.; and
   IV. A register to ensure known Conflict of Interests are recorded and reviewed periodically to determine if accepted risks remain appropriate.

Please note that Conflict of Interests are strictly prohibited unless approved according to internal Flutter processes.

Common examples of Conflict of Interests and what to look out for

Conflict of Interests are not always clear-cut, and you are encouraged to immediately escalate concerns when in doubt, and prior to engaging in a potential Conflict of Interest. Some examples include:

- Using access to Flutter customers, suppliers, employees to support personal endeavours or financial gain;
- Personal relationships which could impact your objectivity for example:
- Managing or hiring a close relative, partner, housemate, friend or someone you are dating;
- Engaging a third party on behalf of Flutter, which could be perceived as actually benefiting a close relative, partner, or yourself (e.g. excessive gifts, hospitality, career progression, etc.);
- Being employed or being engaged as a consultant/freelancer somewhere else while simultaneously working for Flutter;
- Using confidential information about someone or something to your advantage, for example, buying and selling stock or informing our competitors about our strategic strengths and weaknesses; or
- Using Flutter's resources for inappropriate or excessive personal use.

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III. Roles and Responsibilities

We ask that:
- You familiarise yourself with the content of this Policy and report any breach or wrongdoing (past, present, or likely future).
- You avoid any Conflict of Interests, including personal, financial, or any other interest which could impact your objectivity in carrying out your professional duties and responsibilities;
- For Flutter employees:
  - If you are acting in a supervisory position, ensure your team members are aware of this Policy and their obligations to identify and escalate red flags, where appropriate.
  - When in doubt, seek guidance from your line manager, local Compliance or Internal Security team.

You should be aware that failure to comply with this Policy could result in disciplinary action up to, and including, termination of employment or a business relationship, if deemed appropriate by Compliance, Internal Security, HR, or relevant line management.

IV. Reporting Policy Violation

You should raise any concern with someone who can help address them properly. Depending on the circumstances, you may choose to report internally or externally via our Independent Confidential Reporting Service.

Internally

Your Compliance or Internal Security team may be in the best position to address concerns over potential breaches of this Policy. You can also reach out on this matter to your line manager, Procurement team, or other trusted persons such as Flutter's own Legal Counsel or Internal Audit.

Externally

Where it is not possible or comfortable for you to raise a concern internally, or where a concern continues to be unresolved following consultation, you can and should submit a report through our Independent Confidential Reporting Service. Please refer to our Whistleblowing policy for details.

V. Relevant Contact Details

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

Responsibility	Point of Contact	Email
Group Compliance	Group Head of Compliance	complianceenquires@flutter.com

VI. Key Supplementary Documentation

- Flutter Code of Ethics
- Flutter Whistleblowing Policy
- Flutter Anti-bribery and Corruption Policy
- Flutter Gifts and Hospitality Policy

For Flutter employees, please refer to your local intranet for more information and access to supportive material.