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 and supported by the Board Risk and Sustainability Committee (BRSC) or its designate. It will be reviewed and updated on an annual basis and, if necessary, more frequently where regulations or business changes require it.

The purpose of this Policy is to outline:

i. What “Whistleblowing” is and other key definitions;
ii. Our approach to Whistleblowing;
iii. Common examples of wrongdoings;
iv. Flutter’s obligations and commitment to protecting you; and
v. The steps we all must follow when a possible or actual policy violation occurs.

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

II. Statement of Policy

Key definitions

- **Whistleblowing**: Making a protected disclosure of wrongdoing. The law protects you if you raise concerns about possible wrongdoing in the workplace.
- **Good Faith**: A demonstration of sincerity and honesty in your intentions. While you do not need to substantiate your report, ask yourself, is this a personal grievance or is it in the public interest?

- **Whistleblowing should always be in the Public Interest (i.e. Not a personal grievance).**
- **Independent Confidential Reporting Service**: Refer to part IV of this Policy.
- **Confidential Designee**: A Flutter employee charged with the responsibility of managing the investigation of whistleblowing reports.

Our approach to Whistleblowing

Flutter is committed to protecting and facilitating those who report concerns in Good Faith and in the Public Interest. In order to do this, we have:

I. Engaged an Independent Confidential Reporting Service where reports can be made anonymously 24/7. Please see section IV for contact details;
II. Appointed Confidential Designees to facilitate the investigation of all reports, while also ensuring the anonymity and protection of the Whistleblower at all stages; and
III. Implemented Policies, guidelines, and training to ensure you, as well as Confidential Designees, are aware of your rights and obligations.

Although our processes are designed to maintain anonymity of a person, in certain circumstances, this may be difficult or impossible due to the nature and content of a report. Where this is the case, we will notify the person and take reasonable steps to ensure that applicable protections remain in place.

Common examples of reportable wrongdoings

- Actual or suspected breaches of any applicable laws or regulation; for example: financial crime, employee rights, licencing requirements etc;
- Any actual or suspected violation of Flutter policies;
- Retaliation against a Whistleblower;
- Fraud; for example, fabricating compliance, or financial statements;
- Undisclosed conflicts of interest (any relationship which could impact your objectivity which has not been approved previously);
- Theft; including theft of Flutter equipment or cash or belongings of Flutter employees;
- Offensive behaviour;
- Harassment;
- Bullying;
- Discrimination;
- Damage to Flutter property; for example, purposely causing damage or gross negligence;
- Health and safety breaches; for example, blocked emergency exits;
- Drug and/or inappropriate alcohol use in the workplace, or
- Any matter likely to receive negative media or public attention.
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 remember that you do not have to substantiate the claim, but you do need to act in Good Faith and in the Public Interest; and
- If you are acting in a supervisory position, to please ensure your team members are aware of this Policy and are familiar with the Independent Confidential Reporting Service.

We promise to take steps to:
- Acknowledge reports within seven days of receipt;
- Thoroughly investigate reports, while also protecting your anonymity and other rights as a Whistleblower;
- Provide the reporter with feedback from the investigation within three months; and
- Retain records for a period no less than 5 years.

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, HR or relevant line management.

IV. Reporting Policy Violations and Other Wrongdoings

You should raise any concern you may have 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 line manager may be in the best position to address a concern, but you can also raise concerns through your local HR, Compliance 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 via the contact details in the table below:

<table>
<thead>
<tr>
<th>Country</th>
<th>Phone Number</th>
<th>Link to Web Portal</th>
</tr>
</thead>
<tbody>
<tr>
<td>Republic of Ireland</td>
<td>1800 849012</td>
<td></td>
</tr>
<tr>
<td>United Kingdom/ Isle of Man</td>
<td>+44 333 2423759</td>
<td></td>
</tr>
<tr>
<td>Romania</td>
<td>+40 800 890134</td>
<td></td>
</tr>
<tr>
<td>Malta</td>
<td>+356 800 67965</td>
<td></td>
</tr>
<tr>
<td>Portugal</td>
<td>+351 800 460211</td>
<td></td>
</tr>
<tr>
<td>Denmark</td>
<td>+45 802 53840</td>
<td></td>
</tr>
<tr>
<td>Spain</td>
<td>+34 900 988465</td>
<td></td>
</tr>
<tr>
<td>Georgia</td>
<td>+995 800 008071</td>
<td><a href="https://flutter.integrityline.com">https://flutter.integrityline.com</a></td>
</tr>
<tr>
<td>Italy</td>
<td>+39 800 761667</td>
<td></td>
</tr>
<tr>
<td>Australia</td>
<td>+61 20 0617052</td>
<td></td>
</tr>
<tr>
<td>Columbia</td>
<td>+57 2 800 0739</td>
<td></td>
</tr>
<tr>
<td>Bulgaria</td>
<td>+359 800 2100284</td>
<td></td>
</tr>
<tr>
<td>Canada</td>
<td>+1 604 2109763</td>
<td></td>
</tr>
<tr>
<td>India</td>
<td>+91 4717927975</td>
<td></td>
</tr>
<tr>
<td>USA</td>
<td>+1 628 2624028</td>
<td></td>
</tr>
<tr>
<td>Rest of the World</td>
<td></td>
<td><a href="https://flutter.integrityline.com">For a full list of numbers, click on the below link:</a></td>
</tr>
</tbody>
</table>

V. Relevant Contact Details

Reports made through the Independent Confidential Reporting Service will be managed through the appointed Divisional Confidential Designees. If you have any questions about this Policy, please contact Group Compliance:

<table>
<thead>
<tr>
<th>Responsibility</th>
<th>Point of Contact</th>
<th>Email</th>
</tr>
</thead>
<tbody>
<tr>
<td>Group Compliance</td>
<td>Group Head of Compliance</td>
<td><a href="mailto:complianceenquiries@flutter.com">complianceenquiries@flutter.com</a></td>
</tr>
</tbody>
</table>

VI. Supplementary Documentation

- **Flutter Code of Ethics**

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