



I. Introduction, Purpose and Scope

Flutter Entertainment plc, and all of its subsidiaries ("Flutter"), is committed to conducting business honestly, fairly, and with respect for people in accordance with all applicable laws and regulations in each of the jurisdictions in which it operates. Flutter is committed to producing marketing material that is legal, compliant with relevant industry codes, honest, truthful, socially responsible and puts

consumer welfare at its heart. This policy applies to all Flutter subsidiaries, employees as well as agency workers, volunteers, and independent contractors working on behalf of the company (hereinafter to be referred to as "you"). It will be reviewed and updated on an annual basis and, if necessary, more frequently where regulations/business changes require it.

II. Statement of Policy

Flutter is committed to ensuring that all marketing activity adheres to the following principles:

Guiding Principles

1. All marketing material must comply with all relevant legislation, regulations, and Industry Codes of Practice.
2. Promotional Terms and Conditions must be clear, fair, and not misleading.
3. Marketing material will not be directed towards or designed in a manner which appeals unduly to children or vulnerable persons.
4. Marketing material must not knowingly infringe third party intellectual property rights.
5. Marketing material must not knowingly appear on third-party websites which contain copyright infringing, age inappropriate, or sexually explicit content, or content relating to illegal or criminal activities.
6. Flutter will take all reasonable steps to ensure that marketing material produced on its behalf adheres to the guiding principles in this policy.
7. Flutter will not present, directly, or indirectly, that using its products is required in order to achieve financial or social/sexual success or solve personal or financial problems.
8. Flutter will not participate or employ disinformation campaigns against our competitors or gambling as a product.
9. Flutter marketing and promotional materials will be clearly distinguishable as such, with clear labelling in editorial contexts where relevant.
10. Flutter marketing and promotional material will avoid exaggerated and unfounded claims about Flutter's social and environmental impact.

Voluntary Codes

Flutter is a member of the European Gaming and Betting Association ("EGBA") and all marketing material produced in a relevant jurisdiction must comply with the EGBA Code of Conduct on Responsible Advertising for Online Gambling ("EGBA Code"). In the UK, Flutter is also a member of the Betting and Gaming Council ("BGC") and all

marketing material conducted within the UK must comply with the BGC Industry Code for Socially Responsible Gambling Advertising ("IGRG Code"). Flutter subsidiary companies are also signatories to advertising codes of conduct in many other jurisdictions including, Australia, Brazil, and the United States.

Communication and guidance

Flutter will communicate this policy to all appropriate employees. Flutter will provide further guidance and where relevant, training to employees who are charged with responsibilities under this policy.

III. Roles and Responsibilities

Employees must:

- o Familiarise yourself with the content of this policy.
- o Raise or escalate any concerns to their local Compliance Team.

Employees in Marketing roles must:

- o Understand and follow this policy when drafting, designing and promoting marketing materials.
- o Attend and participate in training and awareness activities.
- o Seek guidance from local legal and compliance teams as appropriate.

Company Management must:

- o Assign roles and responsibilities for Ethical Marketing controls to specific people.
- o Communicate this policy to teams to ensure awareness.
- o Ensure teams have access to any relevant guidance materials.
- o Make relevant staff aware that failure to comply with this Policy will 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. Monitoring, Assurance and Breach Reporting



You should raise any concern with someone who can help address them properly. Your Compliance 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 or other trusted persons such as Flutter's own Legal Counsel or Internal Audit. Where it is not possible or desirable to address a particular concern in

consultation with their line manager, or where a Reportable Matter continues to be unresolved following such consultation, you should submit a Report about a Reportable Matter through the Flutter Speak-Up Platform. Please refer to our Whistleblowing policy for details.

V. Relevant Contact Details

While this policy is intended to provide basic guidance, it cannot anticipate the many questions that may arise in this area. Therefore, in the event of any questions with regards to the content, context or meaning of this policy, or if you find yourself in a situation where you are unsure whether an action might violate this policy, please contact:

Marketing Compliance Team – UK & Ireland	Marketing Compliance Team – UK&I	marketingcompliance@flutteruki.com .
Customer Operations Sportsbet	Customer Operations Sportsbet	Customer.Compliance@sportsbet.com.au
Marketing Compliance- Poker Stars	Marketing Compliance- Poker Stars	marketingoperations@pokerstarsint.com
Marketing Compliance Team – FanDuel Group	Marketing Compliance Team – FanDuel Group	fdgmarketingcompliance@fanduel.com
Group Compliance	Head of Regulatory Compliance	complianceenquiries@flutter.com

VI. Supplementary Documentation

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

- o Flutter Code of Ethics