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 Sanctions risks that face 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, 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 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, and independent contractors 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 Sanctions are;
   II. Our approach to managing sanctions risks throughout our business;
   III. What your responsibilities are to guiding against Sanctions risks; and
   IV. The steps we all must follow when a possible or actual Policy violation occurs.

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

II. Statement of Policy

Key definitions

- **Sanctions:** Consist of a wide range of political and/or economic measures which are imposed by governments with the intention of influencing the behaviour of a particular country's regime, individuals, or groups. The types of sanctions measures put in place can vary widely, including, financial restrictions, import/export restrictions and travel bans.

The following are some examples of countries/territories and groups that are the subject of comprehensive and targeted Sanctions:

- Russia
- North Korea
- Cuba
- Iran
- Syria
- Crimea
- Donetsk
- Luhansk
- Narcotics traffickers
- Terrorist organisations
- Human rights abusers

Our approach to Sanctions

Flutter is committed to complying with all economic and trade Sanctions in the jurisdictions in which we operate. We reserve the right to suspend any customer or third-party relationship that is deemed contrary to relevant law. To help ensure that we do business in a compliant manner, we have implemented the following:

   I. Policies, standards, and training to ensure we understand what sanctions are and what their roles and responsibilities are;
   II. Formal escalation channels to flag suspicions of possible or actual Sanctions violations; and
   III. Frameworks and procedures designed to continuously monitor for and prevent Sanctions risks in our global operations.

Summary of Flutter's Sanction's standards

This Policy is supported by standards. The standards seek to establish a benchmark that is met consistently across all subsidiaries. Flutter's Sanctions standards define (non-exhaustively):

- Governance and oversight
- Training and awareness
- Annual Sanctions business risk assessments
- Customer due diligence
- Employee due diligence
- Third party due diligence
- Exiting customer and third-party relationships
- Internal and external reporting
- Record-keeping
- Independent program reviews, as applicable.

Common red flags that you should look out for

Sometimes, individuals and third parties who are sanctioned will try and conceal their true identify in order to get around the controls we have in place to detect and prohibit engagement with them. You must look out for, and report red flags you come across in line with your local Sanctions procedures and escalation channels including:

- At account opening , a player provides information that is misleading, vague, difficult to verify in an attempt to conceal their true identify or evade our onboarding procedures;
- A counterparty has a different name or location than a customer or ultimate end user;
- Unusual invoicing, packaging, and shipping requests that do not align with Flutter's standard business procedures;

Flutter™

Sanctions Policy

Applicability

Global

Issuing function

Legal &
Commercial

- Documents, including contracts, requests to bid, letters of credit, purchase orders, shipping and customs documents, certificates of origin and questionnaires that include words such as "boycott", "blacklist", "whitelist" or similar terms;
- Suspicion or evidence indicating the possible involvement of a Sanctioned territory or party; or
- Surprisingly favourable payment terms or large cash payments.

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).
- For Flutter employees,
  o 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;
  o When in doubt, seek guidance from your line manager or local Financial Crime team; and
  o As a general rule, you should follow guidance from our Procurement and Compliance teams when engaging a third party to ensure appropriate background checks are completed.

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

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

Internally

Your local 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, 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 Information

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 Financial Crime	complianceenquires@flutter.com

VI. Supplementary Documentation

- Flutter Code of Ethics
- Flutter Whistleblowing Policy
- Flutter AML/CFT Policy
- Flutter Anti-Bribery and Corruption Policy

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