

# MODERN SLAVERY

Statement 2024



# INTRODUCTION

## Flutter Entertainment plc Modern Slavery Statement 2024

Flutter Entertainment is a global sports betting and gaming operator with a portfolio of leading international brands and operations. We believe in bringing entertainment to life for our customers in a safe, responsible and sustainable way. Our purpose is to deliver a vibrant and safe sports betting and gaming experience to our customers around the world. Our operations range from sports bookmaking to gaming, with exchanges, poker, fantasy sports and B2B in between.

### UK registered entities

- Betfair Limited
- Bonne Terre Limited
- Tombola Limited
- Hestview Limited
- Power Leisure Bookmakers Limited
- FanDuel Limited

### Our commitment to preventing modern slavery

At Flutter, we recognise that modern slavery is a global threat that imposes an unbearable burden on those affected by it and it is imperative that we take every possible measure to alleviate the suffering caused. It is incumbent on all organisations to ensure that their operations remain free from this invidious practice. We are committed to conducting our relationships to the highest ethical and moral standards and we pledge to act with integrity and professionalism in all our activities.



### Scope and coverage of this statement

This statement has been published in accordance with the Modern Slavery Act 2015 (the "Act"). It sets out the steps taken by Flutter Entertainment plc and our subsidiaries during the year ended 31 December 2024 to prevent modern slavery and human trafficking in our business and supply chains. This is our sixth statement.

This statement has been approved and adopted by the Board of Flutter Entertainment plc, as well as each of the Group's subsidiaries that meet this requirement under the Act (as set out in the Appendix).

As part of our commitment to improving our performance by sharing best practice across our businesses we assess, monitor and mitigate risks relating to slavery and human trafficking on a Group-wide basis, with individual divisions and operating companies taking specific actions where appropriate to the level of risk. In line with this, our statement also applies to all our businesses which are not legally required to make a statement under the Act, regardless of their location, size or turnover.

Approved and signed on behalf of the Board of Flutter Entertainment plc



**Peter Jackson**  
Group Chief Executive Officer

# OVERVIEW

## of our structure, operations and supply chain in 2024

Flutter Entertainment PLC is a public limited company incorporated in the Republic of Ireland\_employs more than 26,000 people globally. On January 29, 2024, the Group completed its registration process with the United States Securities and Exchange Commission (“SEC”) and listed on the New York Stock Exchange (“NYSE”) for public trading. On May 31, 2024, the Group moved its primary listing to the NYSE following the approval of shareholders at the Company’s Annual General Meeting held on May 1, 2024. In addition, the Group maintains a listing on the main market of the London Stock Exchange. Flutter operational headquarters is in New York.

Across our operations, Flutter has a high proportion of colleagues performing highly skilled roles. The majority of our employees are based at offices in Ireland, the UK, the Isle of Man, Malta, Australia, the US, Romania, Portugal, Italy, India, Serbia, Bulgaria and Georgia. The remainder of our colleagues are based in our retail shops and kiosks in the UK, Ireland, Georgia and the US.



### UK & Ireland

In the UK and Ireland (UKI) we offer sports betting and gaming products through our brands Sky Betting & Gaming, Paddy Power, Betfair and Tombola.

Although the brands mostly operate online, this division also includes 576 Paddy Power betting shops in the UK and Ireland.

### Australia

The Sportsbet brand is the market leader in online sports betting across Australia. We offer a wide range of betting products and experiences across local and global horse racing, sports, entertainment and major events.

### International

Flutter International operates in countries around the world offering poker, casino, sports betting, rummy and daily fantasy sports mainly online. Our brands include Sisal, the largest online operator in Italy, and PokerStars, the world’s largest online poker site as well as Betfair International, Adjarabet and Jungle Games and Maxbet.

### US

Our US division consists of FanDuel, TVG and PokerStars (US). The division has a diverse set of online and retail sportsbooks, iGaming, daily fantasy sports, poker online racing wagering and TV broadcasting products across states in the US and the province of Ontario Canada. FanDuel which is Flutter’s largest brand is the US market’s leading online sportsbook and has a major and growing, share of the iGaming market and casino operator in the rapidly expanding US market.

# GOVERNANCE



The Board has overall governance responsibility for Flutter together with its subsidiaries. The Board is the decision-making body for all matters of such importance as to be of significance for Flutter and the Group as a whole because of their strategic, financial or reputational impact. The Risk and Sustainability Committee (the RSC) oversees and monitors the material risks and opportunities facing the Company and oversees the implementation and execution of the Company's objectives and strategy in respect of ESG, which includes modern slavery. The RSC oversee the Company's compliance with legal and regulatory requirements in conjunction with the Audit Committee of the Board of Directors (the "Audit Committee") and provide review and oversight of issues related to the key technology risks facing the Company. Flutter has a dedicated Legal, Risk, Compliance, Sustainability and Procurement teams who supports our procurement and responsible supply chain efforts.



# POLICES

We invest significant time to put in place the appropriate processes, policies and governance structures that guide us in everything we do. We expect suppliers to make all reasonable efforts to conduct business in a way that respects human rights as set out in the United Nations Universal Declaration of Human Rights, the United Nations Guiding Principles on Human Rights and Business, and the International Labour Organisation Core Conventions and Declaration on Fundamental Principles and Rights at Work. Flutter recognises that modern slavery in all its forms is a complex problem with no single root cause which requires a holistic range of preventative measures. There are a number of key codes and policies, approved by Flutter leadership that demonstrate our commitment. These include:

## 1

### Code of Ethics

Our Code of Ethics clearly states our commitment to ensure that we operate in a way that respects, protects, and champions the human rights of all those who come into contact with our operations. The Code of Ethics contains specific provision in relation to identifying and reporting any risk or suspected incidence of modern slavery within the Group's operations. Our Code is available [here](#).

## 2

### Whistleblower Policy

Our Whistleblower Policy outlines our commitment to employees, contractors and supply chains who wish to voice any concerns they may have without fear of retaliation. Our policy is available [here](#).

## 3

### Third-Party Financial Crime Policy ("TPFC")

Our Third-Party Financial Crime Policy and accompanying standards outline our approach to TPFC risk management throughout our business and due diligence processes in place to access third parties. Our policy is available [here](#).

## 4

### Global Procurement and Supplier Risk and Performance Management ("SPRM")

Our SPRM Policy requires that, in assessing the suitability of a supplier or partner partnership, staff are directed to have specific regard to any risk of modern slavery posed by the new or prospective supplier. The purpose of the policy is to ensure that the best value goods and services are provided to Flutter and that supplier risk and performance is appropriately evaluated, measured, managed and controlled to eliminate or mitigate the impact of risks.

## 5

### Supplier Code of Conduct

Our Supplier Code of Conduct sets out our expectations around the behaviour of our suppliers, including direct and indirect suppliers as well as subcontractors, agents, recruitment agencies and external consultants. It makes significant reference to modern slavery, including but not limited to child labour, and forced and bonded labour and gives suppliers information on what to do if modern slavery is found or suspected. Our Supplier Code was updated during the year and is available [here](#).

## 6

### Anti-Bribery and Corruption Policy

Our Anti-Bribery and Corruption Policy sets our zero-tolerance approach to Bribery and Corruption and supports our commitments outlined above. Our Anti-Bribery and Corruption Policy was updated during the year and is available [here](#).

## RISK ASSESSMENT AND DUE DILIGENCE

Flutter operates an entertainment business that is predominantly online based, with some retail presence and live events in countries. Most of our procurement spend is in skilled sectors with a similarly low-risk profile. We abide by all relevant domestic employment legislation in the countries where our staff are employed and ensure appropriate documentation is in place for these employees to work. Whilst our employees work in skilled sectors which are not typically high risk from a modern slavery perspective, we have robust employee due diligence processes including background and verification checks to mitigate the risk of slavery and trafficking. New hires are subject to verification, including national ID/passport checks and right to work documentation.

These checks help mitigate the risk of modern slavery in the recruitment process.

We continue to strengthen and develop our risk management processes and procedures through various forums. We recognise that, with the size and scale of our business, there is a risk that some suppliers may have issues deeper within their own supply chain. We will continue to extend the monitoring of our suppliers for non-compliance with our commitment to preventing modern slavery and we will be particularly vigilant in relation to suppliers in any higher-risk countries and sectors. We have identified suppliers as potentially having a moderate to higher inherent risk in our overall operations and supply chains, e.g. cleaning services and merchandise products, and appropriate criteria are in place with these for onboarding.

During the year we onboarded a third-party supplier ESG platform. This platform evaluates our supplier's overall labour and human rights performance including child labour, forced labour and human trafficking. We have focused on rolling out this platform to our priority suppliers. Of those priority suppliers not utilising the platform we have developed an ESG questionnaire and maturity model. This questionnaire and maturity model ask suppliers questions across the full range of environmental, social and governance criteria (including modern slavery) rolling up to an overall maturity score.



# OUR SUPPLY CHAIN

Flutter's supply chain is large, encompassing thousands of suppliers globally with an annual procurement spend of £5bn. Most of our supply chain spend is in skilled sectors such as professional services, marketing and information technology. The main countries of origin for our key suppliers are the UK, Ireland, USA and Australia.

Our supply chain covers the following main goods and services:

- **content services** for streaming capability, pricing updates and data feeds from local racing and sporting bodies;
- **marketing** for our various brands across the world including advertising and merchandising (e.g. T-shirts);
- **technology** for our software, hardware development and support requirements; and
- **consulting/contractors** to support activities including tech and professional support services.

To date, thousands of entities and individuals in Flutter's supply chain have been screened for risks associated with modern slavery. We continued to focus efforts on extending the tools we employ to screen our suppliers more effectively for risk or exposure to instances of forced labour and human trafficking. We

monitor our suppliers more broadly across the business, commensurate with their risk profile. The screening is not just performed on supplier entities but can be extended to directors and beneficial owners. This allows us to screen new and existing suppliers more effectively against a range of harmful activities, including the risk of modern slavery within their operations. If a Flutter supplier is found to exhibit a risk of such practices in its operations, we expect them to work in conjunction with us to develop and implement a corrective action plan that details actions and a timeframe to address the issue found. If a Flutter supplier is unwilling to engage with us or where such engagement does not reasonably meet Flutter expectations, we reserve the right to terminate the relationship.

In 2024, there was no instances of modern slavery flagged from our screening and Flutter is committed to continuing to screen for such practices and be proactive in monitoring our business for breaches.



# TRAINING AND REPORTING

Employees continue to be trained on modern slavery which is included in our Code of Ethics Mandatory Training. This training aims to increase employee awareness of the potential of modern slavery risks occurring and outlines steps to be taken to report any concerns.

# SPEAK UP PROCESS

We are committed to conducting business honestly, fairly and in accordance with the law. As part of this commitment, we provide a confidential way to report concerns through our Speak Up platform. This platform is hosted by a third party, is available 24/7 and allows for anonymous reporting of any serious concerns including modern slavery. We are committed to protecting and facilitating those who report concerns in good faith and in the public interest. We investigate all reports and take appropriate action as necessary. No instances of modern slavery were reported via our Speak Up Platform.



# OUR FUTURE COMMITMENTS

- To review and update our Modern Slavery Statement every year in line with our commitment to ensuring that our business and supply chain remain free from any association with breaches of the Act.
- To enhance our modern slavery training as required.
- To continue to develop our policies and processes to ensure our approach remains commensurate with our risk profile.
- To continue to work with our priority suppliers to ensure their participation in our ESG rating platform
- To monitor changes in our business and in the environments in which we operate to capture and manage any new or evolving risks so that our zero-tolerance approach to modern slavery is maintained.



**Flutter**<sup>™</sup>  
Entertainment plc

Belfield Office Park,  
Beech Hill Road,  
Clonskeagh,  
Dublin 4,  
Ireland  
[www.flutter.com](http://www.flutter.com)