

Corporate social responsibility 2022

Non-financial information
statement

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**“GAMING IS OUR BUSINESS,
GIVING BACK TO SOCIETY
IS WHAT DRIVES US, AND
RESPONSIBILITY IS OUR
CONSTANT FOCUS”**

1. FDJ Group's approach to Corporate Social Responsibility (CSR)

La Française des Jeux (FDJ) is the successor to the French national lottery, which was founded in 1933 to help injured First World War veterans. Since its inception, corporate responsibility and solidarity have been central to its business model.

In the interest of safeguarding public and social order, FDJ's purpose under the law – in exchange for the exclusive rights awarded under the Pacte Law (No. 2019-486) of 22 May 2019 – is to funnel public demand for gaming into a controlled channel, thereby preventing the risks and potentially negative effects of gaming and gambling activities.

Against this historical and regulatory backdrop, FDJ's gaming model is extensive, recreational and responsible:

- extensive in that it reaches a very large player base;

- recreational because it builds on a diversified range of games fostering moderate gaming habits;
- responsible by virtue of a proactive policy of preventing excessive and underage gambling.

This "responsible gaming" (RG) policy is the foundation of the Company's social responsibility protocols. FDJ aims to be a leading player in the promotion of a responsible gaming model serving sustainable performance and benefiting all stakeholders.

FDJ's business model also benefits French society: in 2022, nearly 90% of stakes collected were redistributed to players (€14.1 billion) or transferred to central government finances (€4.14 billion) and FDJ contributed some €6.5 billion to GDP (Gross Domestic Product).

1.1 A STATUTORY RAISON D'ÊTRE (CORPORATE PURPOSE) DEFINED IN THE ARTICLES OF ASSOCIATION

Following the publication of the Pacte Law, and while also conducting its privatisation and IPO, FDJ defined its *raison d'être* as "*Gaming is our business, giving back to society is what drives us, and responsibility is our constant focus*", and featured it in the preamble to its articles of association, as approved by the General Meeting of Shareholders held in June 2020.

Adopting a *raison d'être* was a natural choice in view of FDJ's history, business model and commitments. This core purpose draws on a broad co-building process with its staff (more than 200 employees have taken part in workshops), its main external stakeholders, including the Social Laboratory (see section 9.2 Dialogue with stakeholders) and CSR and corporate governance specialists.

1.1.1 THE SIX COMMITMENTS RELATING TO FDJ'S RAISON D'ÊTRE

1. Offer

Develop a range of entertaining, upstanding and responsible games.

2. Customers

Assist our customers at every stage of their online and offline gaming experience.

3. Responsible gaming

Limit excessive gambling and prevent underage gambling.

4. Social and environment responsibility

Step up our solidarity, societal and environmental initiatives.

5. Network

Promote local businesses nationwide.

6. International

Promote our responsible gaming model worldwide.

These commitments embody FDJ's *raison d'être* and encompass key CSR themes, but are not exclusively focused on them (gaming product range, responsible gaming, social and community initiatives, territories and the environment). This approach reflects the Group's ambition to make this a very tangible exercise with a strong operational focus.

1.1.2 A STAKEHOLDER COMMITTEE TO MONITOR THE EFFORTS MADE TO HONOUR THE COMMITMENTS RELATING TO FDJ'S RAISON D'ÊTRE

The Stakeholder Committee was created for two reasons: to monitor the efforts made to honour the commitments arising from FDJ's *raison d'être*, and to foster high-level dialogue between the Group's Executive Management and key stakeholders on important issues for FDJ.

The composition of the Stakeholder Committee reflects the diversity and expertise required to honour the commitments set forth in the *raison d'être*. The members of the committee represent the diversity of the FDJ's main stakeholders and/or hold expertise in key areas for the Group.

The thirteen members of the Stakeholder Committee are:

- Rose-Marie Van Lerberghe, who is the committee Chair, former Chief Executive Officer of AP-HP and Chairwoman of Korian;
- Élisabeth Belmas, gaming historian and specialist, Secretary General of scientific interest group Jeu et Sociétés;
- Joëlle Bottalico, Vice-Chairwoman, Haut Conseil de la Vie associative;
- Christian Bucher, psychiatrist specialising in addictive behaviour;
- Jean-Baptiste Carpentier, Head of Compliance – Veolia Group;
- Marion Caspers-Merck, former Chairwoman of the Baden-Württemberg Lottery;
- Christophe Bouillon, Mayor of Barentin, Chairman of the French small towns association (Association des Petites Villes de France);
- Philippe Coy, Chairman of the Confédération des Buralistes;
- Laurence Devillers, Professor of Artificial Intelligence – CNRS, member of the digital ethics committee
- Benoit Halgand, Student – Ecole Polytechnique, co-founder of the Manifeste Etudiant pour un Réveil Ecologique;
- Philippe Moati, Professor of Economics and Co-Chairman of the Observatoire Société et Consommation;
- Louise Nadeau, Professor Emeritus of Psychology – Université de Montréal, expert in addiction;
- Daniel Panetto, Chairman – Culture Presse.

The Chairwoman and CEO and the Deputy Chief Executive Officer of FDJ attend the committee meetings, as do any representatives of the Company that might have an interest in the topics on the agenda.

In 2022, FDJ convened three meetings of the Stakeholder Committee:

- at the January meeting, the committee members reviewed 2021 and assessed the measures taken to honour commitments and embody the *raison d'être* with customers and staff. There was a shared focus on assessing the Stakeholder Committee's work and procedures. The meeting was also an opportunity to discuss the consultation of the French gaming regulator (ANJ) regarding oversight of gaming-related advertising and to inform the committee about the Group's sponsorship strategy and about the work undertaken to redefine FDJ's environmental strategy;
- the June meeting looked at ways of harnessing data and artificial intelligence to ensure operational integrity and covered FDJ's responsible gaming actions. The committee members also discussed FDJ's institutional communication strategy. The results of the SEDAP⁽¹⁾ study into underage gambling in France were also shared at this meeting;
- in October, the members discussed FDJ's innovation strategy and shared their thoughts on the trials presented by FDJ to coincide with the Group's first ever InnoDay. The meeting was also an opportunity to discuss how small local retailers might evolve to keep pace with changing uses and trends in society. FDJ outlined the support it is providing to transform the point-of-sale network, namely through the development of new services alongside gaming, and through assistance for struggling retailers in the form of various support funds, with a view to reinforcing and fostering their strong roots in communities and promoting local business. The Confédération des Buralistes (tobacconists confederation) and Culture Presse also spoke about the actions being taken to transform the tobacconist network and support newsagents in environmental and social areas.

A report on the committee's work was submitted to the FDJ Board of Directors' CSR and Responsible Gaming Committee. The Chair of the Stakeholder Committee also met the members of the CSR and RG Committee in April 2022.

1.2 CSR PERFORMANCE IS A CORE ASPECT OF THE GROUP'S BUSINESS MODEL

FDJ's business model hinges on the dynamic and on the diversity of its core businesses, as well as on the development of adjacent activities. Responsibility is a core component of FDJ Group's business model, through which it is pursuing a proactive policy of preventing excessive and underage gambling.

The Group's business model is in keeping with the recommendations of the International Integrated Reporting Framework. It includes a presentation of the Group's main resources and assets, activities and strategy, as well as a description and measurement of the value it creates for each stakeholder.

(1) Société d'Entraide et d'Action Psychologique (mutual aid and psychological initiative society).

A sustainable value creation model

RESSOURCES

COMMITTED EMPLOYEES

- More than **2,700** employees
- More than **90%** are shareholders, holding approximately **4%** of the capital
- **89/100** employee engagement rate ⁽¹⁾

FRANCE'S LARGEST DISTRIBUTION NETWORK

- Almost **30,000** points of sale in more than **11,000** towns and cities
- **2** integrated supply chains and **100%** of points of sale are operated via direct distribution

AN EXTENSIVE AND SCALABLE OFFER FOR A BROAD PLAYER BASE

- More than **25 million** players representative of the French population aged 18 and over
- A constantly renewed, diversified, and multi-channel offer
- Iconic brands

A ROBUST FINANCIAL SITUATION

- **€925 million** in equity
- **€968 million** in net cash surplus
- **€104 million** in investments

A HIGHEST-STANDARD, RESPONSIBLE GAMING APPROACH

- **10%** of the overall advertising budget allocated to responsible gaming
- **100%** of new gaming offers assessed by Serenigame⁽²⁾ matrices

A PERMANENT INNOVATION APPROACH

- Each year, **1,000** identified start-ups, **500** qualified start-ups, and **20** experiments carried out
- More than **300** French and European start-ups receive direct or indirect FDJ funding
- More than **€75 million** in venture capital commitments to finance start-ups

RECOGNISED, CUTTING-EDGE TECHNOLOGICAL KNOW-HOW

- More than **775** employees work in the Technology Department
- More than **100,000** connected devices in points of sale
- More than **5 billion** transactions processed each year in Group data centres

A HIGH-REACHING ENVIRONMENTAL APPROACH

- A carbon reduction policy in line with the Paris Agreement and validated by the Science Based Targets initiative ⁽³⁾
- A responsible digital technology approach

STRATEGY

We aim to consolidate our leadership position in the French gaming market, and become a renowned international actor in the gaming and services sector.

- ◆ **DIGITALISE** the lottery by developing an omnichannel approach, for a renewed gaming experience and loyal customers.
- ◆ **GAIN** market shares in online gaming open to competition whilst maintaining a growth momentum in offline sports betting.
- ◆ **BUILD** a value-creating customer relationship, and reinforce FDJ's responsible gaming policy through customer identification and knowledge
- ◆ **BUILD** on FDJ's robust economic model by developing new business activities

(1) Taken from the Harris Interactive annual internal employee survey.

(2) Universal and scratch card Serenigame matrices: excessive gaming risks evaluation tool implemented by FDJ.

(3) International initiative to promote setting greenhouse gas reduction targets to limit the increase in global average temperature to 1.5 °C by 2100.

Because FDJ's business model combines long-standing and newer adjacent activities⁽⁴⁾, it fully capitalises on its assets to continue its growth dynamic in a promising market. As a gaming and entertainment leader, the Group has successfully developed its digitalised offer and daily reiterates its expectations for responsible gaming practices.

ACTIVITIES



LOTTERY GAMES DRAW GAMES & INSTANT GAMES

78%
of revenue

(exclusive rights
in point-of-sale
and online)



SPORTS BETTING & ONLINE GAMING⁽⁵⁾

19%
of revenue

(exclusive rights
for point-of-sale
sports betting,
online gaming open
to competition)



ADJACENT ACTIVITIES (International, Payment & Services, Entertainment)

3%
of revenue

VALUE CREATION

SIGNIFICANT FINANCIAL AND EXTRA-FINANCIAL PERFORMANCE

- **€2.5 billion** in revenue
- **24.0%** recurring EBITDA margin
- **85%** consolidated net profit payout ratio in 2022
- Recognised CSR performance: **A1+** awarded by Moody's ESG Solutions for three years running
- FDJ has received The European Lotteries responsible gaming certification at the maximum compliance level

A REDISTRIBUTIVE MODEL

- **68.4%** redistributed to players
- Almost **€1.4 million** paid to responsible gaming partnerships
- **€6.5 billion** in value creation (FDJ's contribution to GDP)
- An incentive scheme and profit-sharing agreement allowing employees to receive up to **24%** of their basic salary

CONTRIBUTION TO PUBLIC INTEREST CAUSES

- **€19.5 million** allocated to the FDJ Corporate Foundation between 2018-2022 and **€25 million** allocated for 2023-2027
- More than **€125 million** collected since 2018 in support of French heritage with Mission Patrimoine games
- **€72 million** in levies paid to the French National Sports Agency

CONTRIBUTION TO REGIONAL DEVELOPMENT

- **€965 million** in commissions paid to retailers
- **55,300 jobs** created or made permanent throughout the sector, **22,000** for bars, tobacconists and newsagents
- **90% of purchases** made in France in 2022 by French entities

AN INCLUSIVE SOCIAL POLICY

- **100/100** on the Gender Equality Index (FDJ SA)
- **36%** of women in management positions and **38.9%** of the workforce are women
- **5.61%** of employees have a disability

HELPING TO PROTECT THE ENVIRONMENT

- **59%** reduction in scope 1 and 2 emissions⁽⁶⁾ in 2021 compared to 2017
- **100%** of gaming materials are printed on FSC®-certified paper from responsible sources

LOOKING AHEAD TO 2030

◆
**Strengthen
our sustainable
growth model
based on player
protection**

◆
**Amplify our
positive impact
on society**

◆
**Become
a truly
international
player**

(4) Growth prospects investigated by the Group to capitalise on its know-how and experience and strengthen its resilience (cf. page 33 of the Universal Registration Document 2022).

(5) Online gaming, excluding the lottery. In France, the authorised competitive online games are sports betting, horse-race betting, and poker.

(6) Reduction of emissions related to the Group's energy consumption: electricity; gas; fuel; air conditioning; and fuel for Company vehicles.

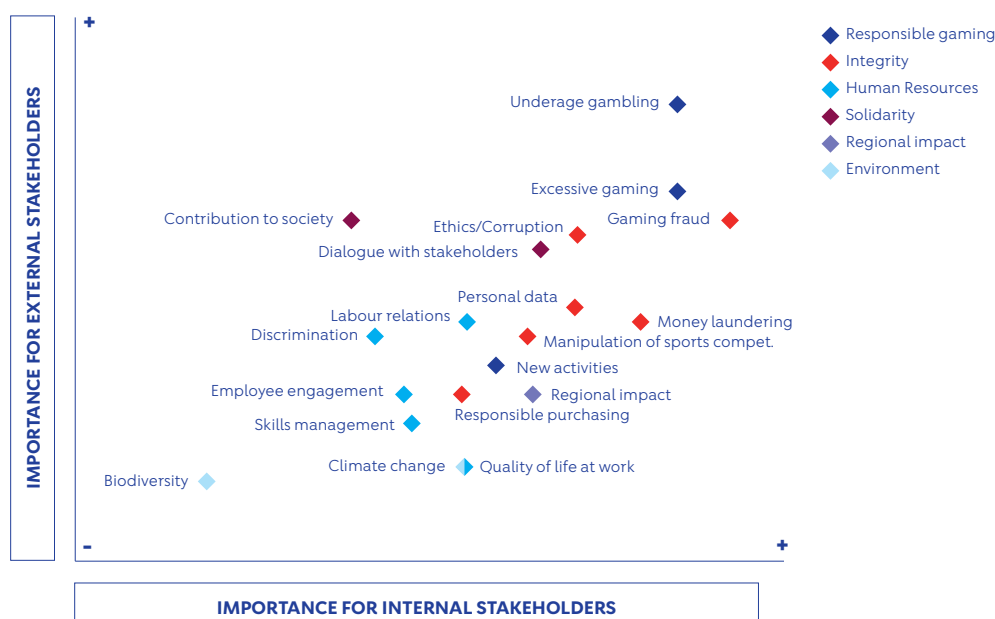
1.3 IDENTIFYING THE MATERIAL ISSUES FOR FDJ

FDJ updated its materiality matrix in 2021 to ensure that CSR issues are always commensurate with stakeholders' expectations. This involved sending out an online questionnaire to around thirty stakeholders (shareholders, suppliers, members of civil society, members of the Social Laboratory and Stakeholder Committee, industry associations, a research firm specialising in consumer trends, etc.). The 2021 materiality matrix covers 19 broadly-significant issues, divided into six categories (responsible

gaming, integrity, human resources, solidarity, territories and the environment).

The results underpin the main directions taken in FDJ's CSR policy, and particularly the preponderance of responsible gaming issues. The Group's top five priorities are therefore still the same: tackling underage gambling, tackling excessive gambling, ethics and efforts to combat corruption, tackling gambling fraud and protecting personal data.

Four risk levels are assigned to these priorities, providing useful information to prioritise CSR actions for the short and medium term.



1.4 AMBITIOUS CSR TARGETS FOR 2025

These targets are a core aspect of the Group's strategy and set tangible medium-term commitments. They cover three key engagement themes for FDJ that are aligned with stakeholders' expectations:

- responsible gaming, particularly the prevention of excessive gambling;

- the environment, with a focus on efforts to tackle climate change, and;
- the Company's overall ESG ⁽¹⁾ performance.

Targets for 2025	
Responsible gaming	Less than 2% of gross gaming revenue ⁽²⁾ to come from high-risk online lottery players
Environment	-50% reduction in direct carbon emissions (Scopes 1 and 2) relative to 2017
ESG performance	Holding onto a score of A1+ and remaining one of the three highest-rated operators in the gambling industry (Moody's ESG Solutions)

The CSR and RG Committee and the Governance, Nominations and Remuneration Committee signed off on these CSR targets at the end of 2021. The targets are applied annually with a view to incorporating them into the

Executive Corporate Directors' annual variable compensation packages (see Chapter 2 "Corporate governance" of the Universal Registration Document 2022).

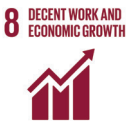


(1) Environmental, Social and Governance.

(2) Gross gaming revenue is the difference between stakes and player payout.





1.5 FDJ'S CONTRIBUTION TO ACHIEVING THE SUSTAINABLE DEVELOPMENT GOALS (SDGS)

The 17 Sustainable Development Goals set by the United Nations form an international frame of reference for CSR, alongside ISO 26000. The SDG targets set for 2030 are designed to meet three broad objectives: eradicate poverty, protect the planet and guarantee prosperity for all.

Drawing on the recommendations of the SDG Compass⁽¹⁾, FDJ identified the main SDGs to which the Group contributes via its CSR initiatives, in respect of the 169 indicators breaking down the SDGs and the French roadmap set out in the 2030 Agenda. FDJ Group's contribution to these seven SDGs is described in the following table:

SUSTAINABLE DEVELOPMENT GOALS	RELATED FDJ GOAL	PARAGRAPH
SDG 8: DECENT WORK AND ECONOMIC GROWTH		
 <p>Promote sustained, inclusive and sustainable economic growth, full productive employment and decent work for all.</p> <p>Target 8.3: promote development-oriented policies that [...] encourage the formalisation and growth of micro-, small- and medium-sized enterprises, including through access to financial services.</p> <p>Target 8.5: by 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value.</p>	<p>Contribute to local economic development through employment, purchases and a presence throughout the country.</p>	<p>10. Territories</p>
SDG 10: REDUCED INEQUALITIES		
 <p>Reduce income inequality within and among countries.</p> <p>Target 10.3: ensure equal opportunity and reduce inequalities of outcome, including by eliminating discriminatory laws, policies and practices and promoting appropriate legislation, policies and action in this regard.</p> <p>Target 10.4: adopt policies, especially fiscal, wage and social protection policies, and progressively achieve greater equality.</p>	<p>Offer an inclusive employee framework conducive to individual and collective performance contributing to the corporate strategy: contribute to equal opportunities and inclusion of all and pursue social and societal action central to the Group's identity since its creation.</p>	<p>8. Human resources</p> <p>10. Solidarity</p>
SDG 11: SUSTAINABLE CITIES AND COMMUNITIES		
 <p>Make cities and human settlements inclusive, safe, resilient and sustainable.</p> <p>Target 11.4: strengthen efforts to protect and safeguard the world's cultural and natural heritage.</p> <p>Target 11.7a: support positive economic, social and environmental links between urban, peri-urban and rural areas by strengthening national and regional development planning.</p>	<p>Continue contributing to general-interest projects as part of efforts to protect and safeguard the cultural heritage and through the presence of points of sale in declining town centres and sensitive urban areas.</p>	<p>9. Solidarity</p> <p>10. Territories</p>

(1) SDG (Sustainable Development Goal) Compass: methodology guide developed by the GRI and the UN Global Compact for companies wishing to contribute to the United Nations 2030 Agenda.

SUSTAINABLE DEVELOPMENT GOALS	RELATED FDJ GOAL	PARAGRAPH
SDG 12: RESPONSIBLE CONSUMPTION AND PRODUCTION		
 <p>12 RESPONSIBLE CONSUMPTION AND PRODUCTION</p> <p>Ensure sustainable consumption and production patterns.</p> <p>Target 12.8: by 2030, ensure that people everywhere have the relevant information and awareness for sustainable development and lifestyles in harmony with nature.</p>	<p>◆ Continue promoting an extensive recreational gaming model.</p>	<p>6. Responsible gaming</p>
SDG 13: CLIMATE ACTION		
 <p>13 CLIMATE ACTION</p> <p>Take urgent action to combat climate change and its impacts.</p> <p>Target 13.2: integrate climate change measures into national policies, strategies and planning.</p>	<p>◆ Limit the impact of the Group's activity on the environment: align the Group's greenhouse gas emissions with the 2°C objective and achieve carbon neutrality.</p>	<p>11. Environment</p>
SDG 15: LIFE ON LAND		
 <p>15 LIFE ON LAND</p> <p>Protect, restore and promote sustainable use of terrestrial ecosystems, sustainably manage forests, combat desertification, halt and reverse land degradation and end biodiversity loss.</p> <p>Target 15.2: by 2020, promote the implementation of sustainable management of all types of forests, halt deforestation, restore degraded forests and substantially increase afforestation and reforestation globally.</p>	<p>◆ Obtain 100% of paper supplies from sustainably managed, FSC® certified forests and help preserve biodiversity in French forests by funding the conservation and restoration of trees that are habitats for rare and endangered species.</p>	<p>11. Environment</p>
SDG 16: PEACE, JUSTICE AND STRONG INSTITUTIONS		
 <p>16 PEACE, JUSTICE AND STRONG INSTITUTIONS</p> <p>Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels.</p> <p>Target 16.5: substantially reduce corruption and bribery in all their forms.</p> <p>Target 16.6: develop effective, accountable and transparent institutions at all levels.</p>	<p>◆ Continue building trust in the business model: contribute to the prevention of fraud, money laundering, corruption and integrity of the sports industry.</p>	<p>7. Integrity</p>

2. CSR governance

2.1 MANAGING CSR WITHIN THE GROUP

Developed in accordance with the ISO 26000 standard on the social responsibilities of organisations, the FDJ Group's CSR policy is an integral part of its governance and strategy. It is one of the pillars of its integrated management system (IMS) (see Chapter 3 "Risk factors and business control framework" of the Universal Registration Document 2022), designed to educate employees about CSR challenges and facilitate the effective roll-out of CSR initiatives across all Group entities.

CSR is central to the Group's 2025 strategic plan, notably through its goal of strengthening actions in the field of responsible gaming (RG), with a view to consolidating its leading position in the gaming and gambling sector in France and Europe. Another illustration is the inclusion of CSR criteria among the factors that determine the annual variable compensation of Executive Corporate Directors.

The Commitment and Responsible Gaming department is tasked with overseeing the preparation and implementation of the engagement policy and CSR initiatives throughout the Group, ensuring their consistency, evaluating their outcomes and facilitating a dialogue with stakeholders.

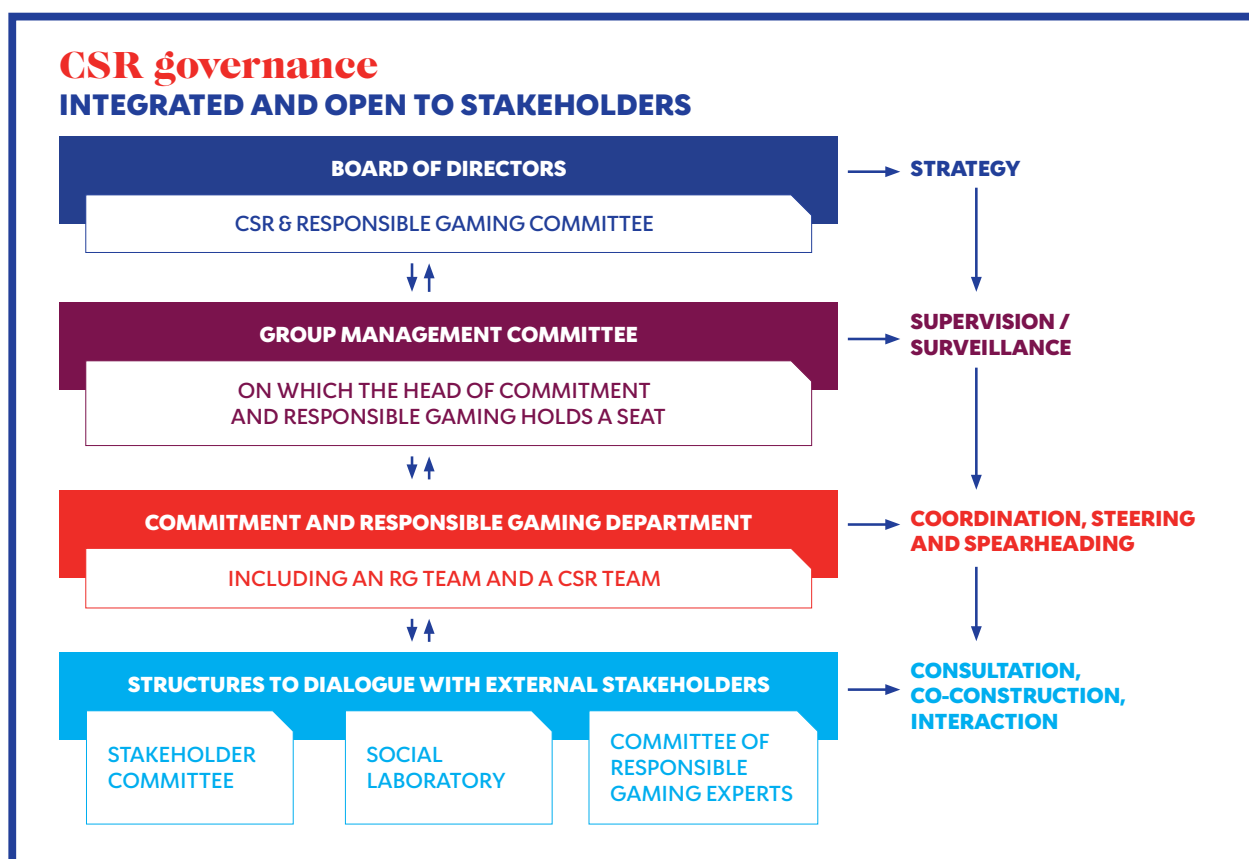
At the operational level, FDJ lays down priority CSR initiatives each year. They are then validated and monitored by the

Group Management Committee, which includes the head of Commitment and Responsible Gaming, before being submitted to the CSR and RG Committee⁽¹⁾. The role of the CSR and RG Committee is to examine the Company's CSR policy as a whole, and more specifically the initiatives relating to responsible gaming and how they fit into the corporate strategy, and to report on its work to the Board of Directors.

At 31 December 2022, this committee had four members:

- Fabienne Dulac, Chairwoman of the CSR and RG Committee, Deputy Chief Executive Officer of Orange and CEO of Orange France, independent director;
- Philippe Pirani, director representing the employees;
- Olivier Roussel, representing Union des Blessés de la Face et de la Tête (UBFT), director appointed by the General Meeting;
- Didier Trutt, Chairman and Chief Executive Officer of IN Groupe (formerly Imprimerie Nationale SA), appointed by the General Meeting on the proposal of the French State.

The Government commissioner and the General Economic and Financial Controller sit on the CSR and RG Committee in an advisory capacity.



(1) Specialised committee of the Board of Directors.

2.2 A SUSTAINED DIALOGUE WITH STAKEHOLDERS

FDJ Group's CSR policy is constructed and coordinated with all stakeholders from both within (employees) and outside (players, network of retailers, suppliers, civil society, government authorities, regulators, etc.) the Group. This in-depth and fruitful dialogue allows for the incorporation of a wide range of expertise and experience, and helps enrich the initiatives implemented.

GOVERNMENT AUTHORITIES AND REGULATORS

- Regulator: national gaming authority (ANJ)
- Supervisory authorities: French economy, finance and budget ministries, TRACFIN, French ministry for the interior (Service Central des Courses et Jeux - central service for racing and gaming), ACPR (prudential supervision and resolution authority), Cour des Comptes
- CNIL (French data protection agency), Financial markets regulator (AMF) and competition authority (Autorité de la concurrence)

SUBSIDIARIES, PARTICIPATING INTERESTS AND CONTROLLED ENTITIES

- FDP
- Française d'Images
- FDJ Développement
- Pacifique des Jeux (PDJ)
- FDJ Gaming Solutions
- FDJ Services
- DVRT 13
- L'Échappée
- SLE
- NLCS
- LEIA
- FDJ Corporate Foundation
- Aleda
- Adstellam (L'Addition)

SHAREHOLDERS

- French State
- Institutional investors
- Individual shareholders
- Veterans' associations
- Employee shareholders

GAMING INDUSTRY

- European Lotteries
- World Lottery Association
- Global Lottery Monitoring System

SUPPLIERS AND PARTNERS

DISTRIBUTION NETWORK

- Intermediaries
- Retailers

PLAYERS

CIVIL SOCIETY

- Experts in key CSR areas
- NGO
- Media
- General public
- Rating agencies

**FDJ GROUP
EXECUTIVES AND
EMPLOYEES**

2.3 CSR TRAINING FOR GROUP STAFF

The entire staff training policy was overhauled in 2021 with a view to training employees in CSR issues. The content of the programme was updated and all members of staff completed a refresher course. The programme places a particular emphasis on the following themes: responsible gaming, tackling fraud and money laundering, ethics and

efforts to combat corruption, diversity and inclusion, responsible purchasing, personal data management, support for territories, societal commitments and environmental issues. 720 employees completed this training in 2022.

3. Non-financial ratings and certifications

Each year, FDJ works to expand the CSR information provided to its stakeholders, non-financial rating agencies and investors.

TYPE OF RATING	RATING AGENCY	SCORE RECEIVED BY FDJ			
		2019	2020	2021	2022
OVERALL ESG RATING (environment, social, governance rating)	MOODY'S ESG Solutions Moody's - US	A1+ 66/100	A1+ 66/100	A1+ 70/100	A1+ ↑ 72/100
	ISS-Oekom ISS-Oekom - Frankfurt stock exchange	-	C+ "Prime" status	C+ "Prime" status	C+ → "Prime" status
	MSCI MSCI - US	-	-	A	A →
	S&P Global SAM (S&P)	-	53/100	57/100	59/100 ↑
	SUSTAINALYTICS (the lower the rating the better)	-	-	15.4	15.6 →
	REFINITIV Refinitiv - UK	B-	B-	B	B →
SPECIALIST RATING	HUMPACT Score Emploi ★★★★★ Humpact - France Specialised in listed companies' impact on employment in France	-	Overall score 5/5 Top 3 in the category "Gender balance"	Overall score 4.5/5 Top 3 in the category "Gender balance"	Overall score 4/5 → Top 3 in the category "Gender balance"
	ecovadis Ecovadis - France Specialised in CSR and responsible purchasing performance	70/100	70/100	-	71/100 ↑
	Gaia Gaia Rating - France Specialised in ESG analysis and ratings for small/mid-caps	-	60/100 Previous methodology 82/100	68/100 Previous methodology 85/100	73/100 ↑ Overhaul of the methodology in 2022
	CDP Alignment with the TCFD recommendations	-	-	B- (Management level)	D ↓ (Disclosure level)

In addition to these non-financial ratings, FDJ has secured special and sector-specific certifications and labels, such as the responsible gaming certification issued by The European Lotteries, renewed in 2021 for three years with a maximum compliance level, and the Diversity and Gender Equality in the Workplace labels (grouped together under the "Alliance" label) issued by AFNOR (French national standardisation organisation), also renewed in 2021 for four years.

4. The main CSR risks facing the Group


In accordance with regulations stipulating the content to be provided in the non-financial information statement, FDJ analysed its CSR risks for the first time in 2018. It updated this analysis in 2020, which it submitted to the CSR and RG Committee. A meeting was held in 2022 between the Commitment and Responsible Gaming department and the Audit, Risks, Controls, Quality and Ethics department, during which the CSR risks were reviewed. To that end, the Company defined its CSR risks, based in particular on:

- CSR materiality analysis;
- the non-financial challenges specific to its business sector;
- the Group's annual risk-mapping exercise;

- the topics presented in Article 2, Chapter II, of the implementing decree ⁽¹⁾ (social, societal, environmental, anti-bribery and tax evasion, and human rights) and Article 1, Chapter III, of the Ministerial Order ⁽²⁾.








The assessment of the main CSR risks liable to affect FDJ was based on an identification and prioritisation methodology involving internal stakeholders representing the Company's various businesses. The methodology was based on risk assessment scales tailored to CSR risk analysis (consistent with the assessment scales used by FDJ Group) and on three main criteria: impact (strategic, financial, reputational and legal), plausibility and estimated control.









This CSR risk analysis is built on six categories, described below:







Theme	Main CSR risks	Main causes of risk emergence	Level of gross criticality*	Main stakeholders affected	Policies, due diligence and results
RESPONSIBLE GAMING 	Underage gambling	<ul style="list-style-type: none"> – Ineffective system for detecting and banning underage gambling; – Identified cases of underage gambling / development of underage gambling; – Failure to comply with regulatory requirements. 	High	<ul style="list-style-type: none"> – Players – Retailers – Partner associations – ANJ 	<p>"Responsible Gaming" approach</p> <ul style="list-style-type: none"> – Responsible gaming action plan – 100% compliance rate in the 3-year responsible gaming certification issued by The European Lotteries <p><i>See section 6.1 Preventing underage gambling</i></p>
	Excessive gambling	<ul style="list-style-type: none"> – Ineffective system for detecting and limiting excessive gambling; – Identified cases of excessive gambling / development of excessive gambling; – Failure to comply with regulatory requirements. 	High	<ul style="list-style-type: none"> – Players – Retailers – Partner associations – ANJ 	<p>"Responsible Gaming" approach</p> <ul style="list-style-type: none"> – Responsible gaming action plan – 100% compliance rate in the 3-year responsible gaming certification – Compliance with the provisions of the Gambling Act <p><i>See section 6.2 Preventing excessive gambling</i></p>
	Development of irresponsible games and services	<ul style="list-style-type: none"> – No positive impact tied to partnerships with start-ups; – No positive impact tied to the digital transformation of gaming (irresponsible play); – Unforeseen negative impacts of innovation; – Impacts from evolving trends in the business and external growth strategy. 	Moderate	<ul style="list-style-type: none"> – Players – Retailers – ANJ 	<p>"Responsible Gaming" approach</p> <ul style="list-style-type: none"> – Responsible gaming action plan – 100% compliance rate in the 3-year responsible gaming certification – "Sérénigame" matrices used to analyse the appeal of gaming products <p><i>See section 6.3 Detecting and supporting persons in vulnerable situations</i></p>

(1) Decree No. 2017-1265 of 9 August 2017.

(2) Order No. 2017-1180 of 19 July 2017.

Theme	Main CSR risks	Main causes of risk emergence	Level of gross criticality*	Main stakeholders affected	Policies, due diligence and results
INTEGRITY 	Money laundering	<ul style="list-style-type: none"> – Identified cases of money laundering / terrorism financing using FDJ games; – Non-existent or inefficient system for preventing, detecting and handling money laundering; – Failure to comply with regulatory requirements. 	 High	<ul style="list-style-type: none"> – Group and subsidiaries – Retailers – Shareholders – ANJ 	"Integrity of operations" approach <ul style="list-style-type: none"> – Anti-money laundering and counter-terrorist financing (AML-CTF) measures. <i>See section 7.2 Preventing money laundering</i>
	Gambling fraud	<ul style="list-style-type: none"> – Identified cases of fraud using FDJ games; – Non-existent or inefficient system for preventing, detecting and handling fraud; – Failure to comply with regulatory requirements. 	 High	<ul style="list-style-type: none"> – Group and subsidiaries – Retailers – Shareholders – Players – ANJ 	"Integrity of operations" approach <ul style="list-style-type: none"> – Anti-fraud action plan <i>See section 7.1 Combating gambling fraud</i>
	Security and data privacy breaches	<ul style="list-style-type: none"> – Occurrence of a personal data leak; – Monetisation of personal data by FDJ without prior consent; – No mature or suitable data management system. 	 Moderate	<ul style="list-style-type: none"> – Players and customers – Retailers 	"Integrity of operations" approach <ul style="list-style-type: none"> – ISO 27001 certification relating to the implementation of an information security management system – Group Information System Security Policy (GISSP) <i>See section 7.4 Personal data protection</i>
	Failure to comply with anti-corruption requirements	<ul style="list-style-type: none"> – Breaches of fairness (corruption, collusion, conflicts of interest, etc.); – Occurrence of one or more practices reflecting poor business ethics (failure to uphold free competition, non-transparent lobbying, failure to comply with regulations and internal rules, etc.); – Non-existent or inefficient system for preventing, detecting and handling such practices. 	 Moderate	<ul style="list-style-type: none"> – Group and subsidiaries – Retailers – Shareholders – Players 	"Integrity of operations" approach <ul style="list-style-type: none"> – Programme to prevent and detect corruption and influence peddling – Ethics Charter supplemented by an Anti-Corruption Code of Conduct, related procedures and a whistle-blowing system – Responsible tax policy <i>See section 7.5 Promoting ethical business management and fighting corruption</i>
	Outside manipulation of sports competitions	<ul style="list-style-type: none"> – The manipulation of sports competitions tied to sports betting. 	 Moderate	<ul style="list-style-type: none"> – Group and subsidiaries – Retailers – Players – Suppliers and partners 	"Integrity of operations" approach <ul style="list-style-type: none"> – Member of the Global Lottery Monitoring System's Executive Committee, making it possible to pool sports-betting monitoring data – Active participation in setting up a national standards framework on integrity in sport – Plan to promote the integrity of athletic competitions <i>See section 7.3 Preventing the outside manipulation of sports competitions</i>
	Unethical practices in the value chain	<ul style="list-style-type: none"> – The occurrence of unethical practices (human rights violations, harmful impacts on the environment) among suppliers and partners; – Unethical practices on FDJ's part towards its suppliers and partners (overly-long payment times, excessive levels of dependency). 	 Moderate	<ul style="list-style-type: none"> – Group and subsidiaries – Suppliers and partners 	"Integrity of operations" approach <ul style="list-style-type: none"> – Responsible purchasing policy – Supplier CSR risk mapping – "Responsible supplier relations and purchasing" label <i>See section 7.6 Promoting responsible purchasing</i>

Theme	Main CSR risks	Main causes of risk emergence	Level of gross criticality*	Main stakeholders affected	Policies, due diligence and results
HUMAN RESOURCES 	Poor skills management	<ul style="list-style-type: none"> Problems recruiting and retaining talent, particularly in tech-related areas (tied to brand image, compensation package); Insufficient development of employee skills; Insufficient use of in-house career mobility. 	 Moderate	<ul style="list-style-type: none"> Group and subsidiaries Employees 	"Human Resources" approach <ul style="list-style-type: none"> Employment and skills planning Training policy Individual career mobility plan <i>See section 8.1 Ensuring sound management of employee skills</i>
	Breakdown of social dialogue	<ul style="list-style-type: none"> Breakdown of dialogue with employee representation bodies; Major changes in work organisation to be led as part of the implementation of the strategy. 	 Moderate	<ul style="list-style-type: none"> Group and subsidiaries Employees 	"Human Resources" approach <ul style="list-style-type: none"> Presence of employee representation bodies Signature of collective agreements <i>See section 8.2 Promoting a constructive social dialogue</i>
	Discrimination and lack of diversity	<ul style="list-style-type: none"> Identification of discriminatory practices; Identification of pay gaps and unequal promotion prospects; No system in place to detect and handle cases. 	 Moderate	<ul style="list-style-type: none"> Group and subsidiaries Employees Players 	"Human Resources" approach <ul style="list-style-type: none"> "Diversity and Inclusion" policy Agreement on "gender equality, quality of work life and diversity" ALLIANCE label combining the Gender Equality and Diversity labels. <i>See section 8.3 Strengthening diversity, inclusion and gender equality in the workplace</i>
	Deteriorating quality of life at work	<ul style="list-style-type: none"> Inadequate work spaces; Stress situations not addressed; Pandemic-related crisis (e.g. COVID). 	 Moderate	<ul style="list-style-type: none"> Group and subsidiaries Employees 	"Human Resources" approach <ul style="list-style-type: none"> Occupational health and safety policy "FDJGroupForMe" external support service <i>See section 8.4 Developing quality of work life</i>
	Disengagement of employees	<ul style="list-style-type: none"> Loss of employee confidence in internal governance; Perception of governance as being unfair, unrepresentative and irrelevant. 	 Moderate	<ul style="list-style-type: none"> Group and subsidiaries Employees 	"Human Resources" approach <ul style="list-style-type: none"> Employee climate survey <i>See section 8.5 Ensuring employee engagement</i>
SOLIDARITY 	Deteriorating dialogue with stakeholders	<ul style="list-style-type: none"> Breakdown of constructive dialogue with stakeholders (retailers, players, regulator, civil society, NGOs); Criticism from stakeholders; Unrepresentative stakeholders consulted. 	 Moderate	<ul style="list-style-type: none"> Retailers Shareholders Players Suppliers and partners Civil society 	"Solidarity" approach <ul style="list-style-type: none"> Social Laboratory bringing together a dozen organisations from civil society Stakeholder Committee Materiality matrix <i>See section 9.2 Dialogue with stakeholders</i>

Theme	Main CSR risks	Main causes of risk emergence	Level of gross criticality*	Main stakeholders affected	Policies, due diligence and results
SOLIDARITY (CONT.)	Deteriorating contribution to society	<ul style="list-style-type: none"> FDJ's disengagement from society in the areas of sport and socially-responsible investment; A disengagement from social utility missions by staff and retailers (namely, fewer actions by the Foundation). 	 Moderate	<ul style="list-style-type: none"> Retailers Civil society 	<p>"Solidarity" approach</p> <ul style="list-style-type: none"> FDJ Corporate Foundation Call for solidarity projects from Group retailers "Mission Patrimoine" operation <p>See section 9.1 Societal engagement</p>
TERRITORIES 	Weaker territorial foothold	<ul style="list-style-type: none"> Overly-weak socioeconomic impact in territories; A fall in business induced by FDJ's presence in the territories. 	 Moderate	<ul style="list-style-type: none"> Retailers Civil society 	<p>"Territories" approach</p> <ul style="list-style-type: none"> Programme to support retailers Assessment of FDJ's economic and social contribution in France <p>See sections 10.1 Support for the point-of-sale network / 10.2 Diversification of services at points of sale / 10.3 Economic and social contribution</p>
ENVIRON- MENT 	Increase in GHG emissions	<ul style="list-style-type: none"> Adverse impact of the Group's operations on the environment; Questioning of how waste from gaming materials is managed: paper or unsustainable components, transport / freight; Greenwashing accusations; Failure to comply with new laws; Lack of efficiency (waste and energy). 	 Moderate	<ul style="list-style-type: none"> Group and subsidiaries Retailers Players Suppliers and partners Civil society 	<p>"Environment" approach</p> <ul style="list-style-type: none"> Policy of reducing carbon emissions (carbon review) Mapping of climate-related financial risks and opportunities (aligning with the TCFD recommendations) Green IT approach <p>See section 11.1 Combating climate change</p>
	Loss of biodiversity	<ul style="list-style-type: none"> Impact of the use of paper (deforestation); Lack of natural resources for production purposes (paper, rare metals); Questioning of how waste from gaming materials is managed: paper or unsustainable components, transport / freight; Impossibility for us to replace our plastic-based gaming materials should the law require us to do so. 	 Low	<ul style="list-style-type: none"> Group and subsidiaries Retailers Players Suppliers and partners Civil society 	<p>"Environment" approach</p> <ul style="list-style-type: none"> Life cycle analysis of gaming materials Biodiversity footprint of gaming materials using the <i>Global Biodiversity Score</i> Financing of certified forest restoration or conservation projects <p>See section 11.2 Taking action to preserve biodiversity</p>

* The level of gross criticality factors in impact (in strategic, financial, reputational and legal terms) and plausibility (likelihood of risk occurrence and/or frequency of risk emergence). Risk control measures are not taken into consideration in the calculation of gross criticality.

Nothing significant occurred in 2022 to warrant this analysis being updated.








The objectives, policies, due diligence procedures and key performance indicators relating to each of the six categories are described in detail in the following sections.

Additionally, the most material CSR risks at Group level are described in Chapter 3 "Risk factors and business control framework" of the Universal Registration Document 2022.

The following topics have not been addressed in this chapter as they have not been deemed relevant to FDJ's activity: prevention of food waste, prevention of food insecurity, commitments to promote responsible, fair and sustainable food, and respect for animal welfare.

5. Overview of the Group's non-financial performance

Commitment and Responsible Gaming department

	NON-FINANCIAL INDICATORS	2021	2022
Non-financial ratings 	– Moody's ESG Solutions	A1+ ; 70/100	A1+ ; 72/100
	– S&P SAM	57/100	59/100
	– Sustainalytics	15.4/100	15.6/100
	– MSCI	A	A
Responsible gaming 	– Share of gross gaming revenue coming from high-risk online lottery players	-	2.34%
	– Share of Playscan "red" online lottery and online sports betting players	1.95%	2.18%
	– Share of excessive gamblers based on the Canadian Problem Gambling Index	1.20%	1.20%
	– Share of total advertising spending devoted to responsible gaming messages	11.80%	13%
Integrity 	– Rate of point-of-sale compliance with responsible gaming criteria	93.80%	94.80%
	– Average supplier payment times	37 d.	38 d.
	– Share of strategically-important and major suppliers assessed based on CSR performance	68%	73%
Human resources 	– Share of women in the Group workforce	39.00%	38.90%
	– Share of women managers at the Group	34.39%	36.00%
	– Rate of employment of people with a disability within the Group	5.21%	5.61%
	– Purchases from vocat. rehabil./disability-inclus. comp.	€924k	€1,306k
	– Employee engagement rate	91/100	89/100
Solidarity 	– Contributions to general interest causes	€108m	€137m
	– Financial support provided by the FDJ Corporate Foundation	€4,765k	€4,414k
Territories 	– Number of jobs created or made permanent through FDJ's operations	54,450	55,300
	– Number of jobs created at bars / tobacconists / newsagents	21,100	22,000
	– FDJ's contribution to gross domestic product (GDP)	€6.2bn	€6.5bn
	– Share of purchases (in value) from SMEs and ISEs	58%	85%
	– Share of purchases made in France	90%	90%
Environment 	– Reduction of Scopes 1 and 2 GHG emissions (relative to 2017)	59%	available in May 2023
	– Share of electricity covered by a renewable guarantee of origin (GoO) certificate	99%	available in May 2023
	– Number of hectares of forest protected through "FSC Biodiversity Ecosystem Services"	39.6 ha	105.2 ha
	– Share of gaming materials printed on paper sourced from FSC-certified forests	100%	100%

6. Responsible gaming

FDJ operates in the gaming and gambling industry, which is a regulated sector because of the specific risks it entails, particularly from a public health perspective.

The findings of an AFNOR (French national standardisation organisation) audit prompted The European Lotteries to renew FDJ Group's responsible gaming certification (see section 3 Non-financial ratings and certifications). This certification underpins the Group's long-standing commitment to upholding responsible gaming values, a mainstay of the FDJ gaming model. Through a system of equivalence, it has enabled FDJ Group to secure the highest certification level issued by the World Lottery Association (WLA).

This maximum level of certification underpins FDJ's status as the French leader in responsible gaming when it comes to gambling, and as one of the leaders in Europe.

In accordance with the regulatory provisions that apply to lottery and sports betting games, FDJ is required to have its "action plan for the prevention of excessive gambling and underage gambling, and for the promotion of reasonable gaming practices" ⁽¹⁾ approved by the French gaming regulator (ANJ) each year.

In 2022, FDJ submitted its responsible gaming action plan to the ANJ. This plan is aligned with the Group's efforts to continuously improve and enhance the responsible gaming systems in place and incorporates the concerns expressed by stakeholders. Following its review, the ANJ found the action plan for activities exercised under exclusive operating rights to reflect a "proactive, coherent and structured policy of preventing excessive or pathological gambling and underage gambling" that addresses the issues established by the law.

FDJ's responsible gaming actions⁽²⁾ encompass its lottery operations and its sports betting operations.

6.1 PREVENTING UNDERAGE GAMBLING

FDJ is required by law to prevent minors, even emancipated minors, from participating in the gaming and gambling activities it provides⁽³⁾. In recent years, regulations have tightened and stakeholder expectations have grown. The ministerial order of 2 October 2019, enacting the Pacte Law, introduced stronger penalties for the failure to comply with the rules governing the gaming and gambling sector.

Preventing underage gambling is one of the pillars of FDJ's responsible gaming policy.

The Group has introduced three practical mechanisms to tackle underage gambling:

- preventive information campaigns for the general public;
- training for the sales force and retailers;
- audits of the point-of-sale network.

6.1.1 PREVENTIVE INFORMATION CAMPAIGNS FOR THE GENERAL PUBLIC

FDJ is continuing to conduct information campaigns to warn about the dangers of underage gambling. These awareness campaigns for the general public are broadcast through institutional and commercial channels. FDJ has chosen to air televised campaigns and display messages at points of sale.

In 2022, FDJ continued to step up its awareness efforts to prevent underage gambling by:

- furthering its commitment to broadcasting prevention messages by increasing to 10% the share of all advertising spending devoted to responsible gaming messages, across all media formats. A large number of responsible gaming television campaigns were aired, under the FDJ brand and sub-brands;
- continuing actions to limit the exposure of minors to the Group's advertising campaigns, and introducing a specific indicator that measures the impact of advertising, particularly through television. This measurement tool has been useful to monitor and direct the steady decrease since 2016 in the exposure of minors to FDJ's televised media campaigns, a rate that has been below 5% since 2020;
- rolling out new displays carrying prevention messages in points of sale to raise more awareness about and draw more attention to underage gambling laws (new prevention poster "Not 18? No gambling" in the windows of points of sale, new poster to encourage customers to present proof of identity "Step 1! Show your ID" in points of sale that were found wanting in a first round of underage gambling testing).

(1) The responsible gaming action plan ("RGAP") for activities exercised under exclusive operating rights was submitted to the ANJ on 31 October 2022. The RGAP for online sports betting and poker games was submitted to the ANJ on 31 December 2022.

(2) Responsible gaming actions relating to FDJ's operations in the United Kingdom are overseen by the *UK Gambling Commission*.

(3) Article 139 of the Pacte Law states that it is prohibited to sell, or to offer free of charge, games of chance to minors at points of sale authorised to sell lottery and sports betting games, and Article L. 320-7 of the French internal security code (*Code de la Sécurité Intérieure*) stipulates that minors, even emancipated minors, are prohibited from participating in online and offline gambling activities.

6.1.2 TRAINING THE SALES FORCE AND RETAILERS

Training and raising awareness in the retailer network is one of the pillars of FDJ's responsible gaming policy, with a key focus on preventing underage gambling. These actions are part of a comprehensive training and support system that lasts throughout FDJ's partnership with retailers.

In 2022, FDJ continued its responsible gaming induction and ongoing training programmes, with more than 3,800 new retailers completing the induction course. It also stepped up the implementation of specific training measures as part of underage gambling testing campaigns, through round tables (attended by more than 1,150 retailers), e-learning modules (completed by more than 3,300 retailers) and special programmes developed for retailers found wanting in their enforcement of the law.

6.1.3 AUDITS OF THE POINT-OF-SALE NETWORK

FDJ conducts two types of audits to ensure compliance with the law prohibiting sales to underage players:

Inspections carried out at points of sale since 2014 verify that they meet six criteria, two of which relate to the prevention of underage gambling, i.e. the presence of posters and stickers stating that the sale of gambling products to minors is prohibited. Furthermore, FDJ's retailers only receive a "responsible gaming bonus" if they are found to comply with these criteria on inspection.

PERFORMANCE INDICATOR: OVERALL COMPLIANCE WITH RESPONSIBLE GAMING AND SECURITY CRITERIA

	2021	2022
FDJ Group excl. PDJ	93.8%	94.8%

The overall compliance of points of sale is assessed with regard to behavioural, commercial, contractual and regulatory criteria.

FDJ has also been developing testing campaigns since 2015 to gauge the effectiveness of training initiatives, step up audits of retailers and gain more insight into the reality of underage gambling in the network. These campaigns, conducted in association with SEDAP (Société d'entraide et d'action psychologique - mutual aid and psychological initiative society), involve sending "mystery" underage shoppers to points of sale under the supervision of a network inspector.

A tougher and gradually increasing 4-level penalty system was introduced in 2021 specifically targeting retailers who repeatedly sell gambling products to underage customers. FDJ continued to apply this system in 2022.

If a mystery shopper operation finds that they are selling to minors, retailers will first receive a warning and be required to display an additional poster to encourage players to present proof of identity. They will then be systematically re-tested no later than six months after that, using the same procedure.

If they are again found to be contravening the law, they will lose their FDJ license for two weeks and be subject to another inspection the following year. They will be offered the chance to halve this suspension period to one week by agreeing to complete a "second chance" course.

Further evidence of failure to comply in the next inspection will cause them to lose their licence for one month - halved to two weeks if they complete another, more intensive, "last chance" course. They will undergo a final inspection the following year.

Where this fourth inspection reveals an ongoing failure to comply, the retailer will lose its FDJ licence outright. In 2022, nearly 2,700 inspections were carried out and 100 retailers lost their licence for repeatedly failing to enforce underage gambling laws.

6.2 PREVENTING EXCESSIVE GAMBLING

Gambling may create a risk of addiction for some players. With this in mind, for more than twenty years now, FDJ Group has been making significant efforts to prevent problem gambling habits.

These actions make up the second major focus of FDJ's efforts to promote responsible gaming. FDJ is continuing to strengthen its actions in this area based on five key areas:

- evaluating the appeal of the gaming range and advertising/promotional initiatives;
- providing preventive information on the risks associated with excessive gambling;
- training the sales force and retailers, as well as staff;
- assessing gaming habits;
- providing specific support for online players.

6.2.1 EVALUATING THE APPEAL OF THE GAMING RANGE AND ADVERTISING/PROMOTIONAL INITIATIVES

The gaming range and promotional/advertising initiatives are evaluated through a process of interaction between FDJ's responsible gaming and marketing teams, as well as its stakeholders. Gaming ranges are also monitored by the regulator under the system that requires prior ANJ authorisation, with all gaming and betting activities operated by FDJ under exclusive rights being subject to these requirements.

The responsible gaming teams analyse the appeal of each new game under development, based on each aspect (design, name, etc.), with a particular emphasis on the mechanics of the game.

Before, during and after a game comes on the market, adapted measures accompany the development and marketing of the product to promote recreational gaming. At the operational level, a specific process ensures that issues relating to the prevention of excessive gambling patterns are taken into consideration when new products and features are being developed. A trial phase is also run for some new products to ascertain their impact on player behaviour.

At the design stage for a new game and/or a new feature in the mechanics of an existing game, the appeal of the product is assessed through analysis charts that FDJ has developed together with experts. Three different matrices are used:

- a general matrix used to assess all gambling products released by FDJ (*Serenigame® universelle* developed in 2012);
- a matrix used to assess scratch games (*Serenigame® grattage*) rolled out in 2018;
- a matrix used to assess sports betting products (*Serenisport*) designed in 2019.

Serenigame® is a tool used to assess the appeal of a new or reformatted game as early as the design stage. Depending on the outcome of this assessment, changes may be made to the game's mechanics or components.

RESULT: NUMBER OF NEW OR RE-ISSUED GAMES SUBJECT TO THE UNIVERSAL SERENIGAME® MATRIX

	2021		2022	
	Number	Share	Number	Share
FDJ	38	100%	36	100%

In 2022, all new and reformatted games were subject to the universal Serenigame® matrix.

Alongside the matrices developed to assess how attractive its gaming products are, FDJ developed and trialled a new SereniPromo matrix in 2022 to analyse the appeal of its promotional offers. SereniPromo is expected to be up and running sometime in 2023. It is aimed at assessing what influence the various components of a promotional offer may have (prize appeal, eligibility to participate, terms and conditions) in order to determine the associated level of excessive gambling risk.

Lastly, a Committee of Responsible Gaming Experts, which FDJ set up on its own initiative, is asked to issue an opinion on the most innovative or potentially sensitive new projects. Its members specialise in different areas: addictive behaviour, psychiatry, psychology and human sciences. It is consulted regularly on the development of gaming products, large-scale advertising campaigns, as well as new services developed to help players control and monitor their gaming habits, throughout their gaming experience (moderation mechanisms, tool to analyse gaming patterns).

6.2.2 PREVENTIVE INFORMATION ON THE DANGERS OF EXCESSIVE GAMBLING

Raising public awareness about preventing excessive gambling has been an important part of FDJ's efforts for many years. This harnesses several channels (television, digital media, messages in points of sale and events) to maximise the impact of the message.

In 2022, FDJ continued to step up its awareness efforts to prevent excessive gambling by:

- furthering its commitment to broadcasting prevention messages through a number of television campaigns focusing on responsible gaming habits;
- preparing a new responsible gaming pamphlet to be handed out to players throughout the network of almost 30,000 points of sale, with a special focus on preventing excessive gambling;
- optimising the visibility of responsible gaming measures on the *fdj.fr* website by highlighting tips and services to help promote healthy play.

PERFORMANCE INDICATOR: SHARE OF ADSPEND DEVOTED TO RESPONSIBLE GAMING MESSAGES ACROSS ALL MEDIA FORMATS

	2021	2022 ⁽¹⁾
FDJ Group	11.8%	13%

(1) Scope covering Metropolitan France only.

The 2021 figure represents the share of advertising spending devoted solely to televised responsible gaming messages. The 2022 calculation encompasses advertising across all media formats.

Training the sales force, retailers and staff

All FDJ employees and the entire commercial network receive training in the prevention of excessive gambling. A variety of programmes have been developed (induction or ongoing training, with a general or specific focus, face-to-face or remotely) and the content is determined with partner healthcare and social services (e.g. S.O.S. Joueurs, etc.).

FDJ is stepping up its training efforts with a view to promoting the development of skills and shared practices to detect and support people in vulnerable situations, in keeping with the regulatory requirement to detect problem gamblers as stipulated in the reference framework⁽¹⁾.

(1) Reference framework for the prevention of excessive or problem gambling and the protection of minors, published in France's official legal gazette ("Journal Officiel") on 15 April 2021.

6.2.3 SALES FORCE AND RETAILERS

Alongside the Company's induction and ongoing training programmes, FDJ is developing specific measures to tackle excessive gambling.

In 2021, FDJ worked with SEDAP to develop new content to enhance understanding of such issues within the sales force and to reinforce their capacity to detect players in potentially vulnerable situations very early on.

Additional training programmes were also developed, including a "How to prevent excessive gambling" e-learning module. More than 6,000 retailers completed this training in 2022.

Lastly, alongside the awareness and training initiatives organised for retailers as part of the 2022 FIFA World Cup action plan, FDJ also held in-person events hosted by the sales force.

6.2.4 EMPLOYEES

FDJ overhauled its CSR training programme for all employees in 2021, with one of the main sections being devoted to the Group's responsible gaming policy. 240 employees completed responsible gaming training in 2022.

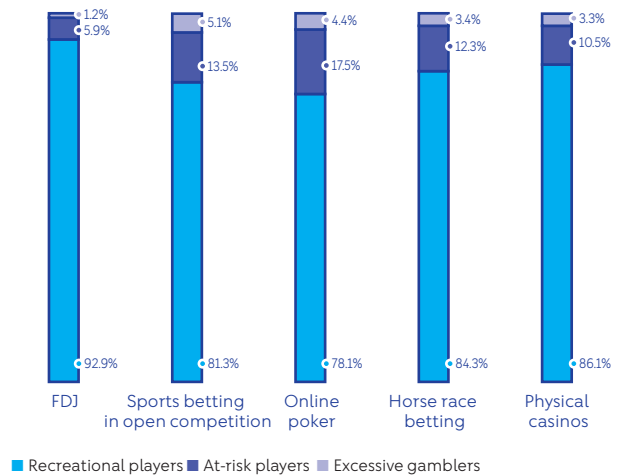
FDJ also holds more extensive training sessions for employees and helpline staff who are in direct contact with players, prize-winners and retailers, who might be confronted with vulnerable cases or problem gambling.

Assessing gaming habits

FDJ has been assessing the risk profile of its player base since 2019 using the Canadian Problem Gambling Index (CPGI). The CPGI is a questionnaire-based globally-recognised index used to assess which of four profiles a player falls into: non-excessive gambler, low-risk gambler, moderate risk gambler or problem gambler. The aim is to monitor how the risk profile of the player base evolves over time and then to compare these findings with the results of prevalence studies conducted by the Observatoire des Jeux (ODJ - gaming observatory).

A comparison with the results of the most recent available prevalence study published by the ODJ in July 2020 found that the proportion of excessive gamblers in the FDJ player base was lower than the proportion observed in the study across the entire population of gamblers in France (excessive gamblers representing 1.6%). These results show that the proportion of excessive gamblers is far lower among the FDJ player base than among players in other gambling categories in France. Player distribution according to CPGI profile remained stable between 2021 and 2022, with no statistically significant change.

PLAYER DISTRIBUTION ACCORDING TO CPGI PROFILE - GAMBLING AND GAMING IN FRANCE*



* Study conducted in October 2022 based on a representative sample of the population.

In particular, a comparative analysis of the prevalence of problem gambling in the different gambling segments in France found that the proportion of problem gamblers (aggregating the proportion of moderate risk gamblers and the proportion of excessive gamblers) in the different lottery segments was much smaller than in other gambling segments in France. This clearly shows that FDJ has developed an extensive gaming model through its lottery operations, in relation to other game ranges. It also justifies FDJ's ambitious responsible gaming approach, which takes into consideration the very large volume of lottery players.

Providing specific support for online players

FDJ provides online players with a number of ways to monitor and control their online gaming habits:

- Playscan™, developed by the Swedish lottery, assesses the risk associated with a player's gaming habits on a scale of three levels (green, yellow or red) and shares the result with the player. In 2022, players falling into the Green category (recreational) made up 92.57% of the player base, while those falling into the Yellow category (moderate) accounted for 5.25%, equating to a total of 97.82%, down slightly compared with 2021. The proportion of players falling into the Red category (at-risk gamblers) rose very slightly in 2022 (from 1.95% in 2021 to 2.18%), but remained very low;

PERFORMANCE INDICATOR: DISTRIBUTION OF ONLINE LOTTERY AND SPORTS BETTING PLAYERS AS ASSESSED BY PLAYSCAN™ (1)

	2021	2022
Green	92.67%	92.57%
Yellow	5.38%	5.25%
Red	1.95%	2.18%

- game moderation mechanisms that enable players to set limits for themselves. In addition to the mandatory game moderation mechanisms required by law (namely a mandatory weekly stake-capping mechanism on online lottery stakes), FDJ has taken active steps to develop more restrictive and targeted moderation mechanisms.

FDJ has notably enhanced its:

- daily stake-capping moderation mechanism for online lottery players, with the setting of a mandatory or optional daily limit depending on the player's profile,
- optional loss moderation mechanism for online sports bets, whereby online *ParionsSport* players who display high-risk gambling patterns can elect to set a weekly loss limit;
- in addition to these tools, players can also impose a temporary self-ban or have their name placed on the ANJ's gambling exclusion list.

As an extension of the tools in place to analyse online gaming habits, FDJ is working with its stakeholders to experiment models that analyse the behaviour of online lottery players. The aim is to define an in-depth segmentation of risky habits that will be used to develop targeted and more personalised prevention systems.

6.3 DETECTING AND SUPPORTING PERSONS IN VULNERABLE SITUATIONS

For several years, FDJ has been working on measures aimed at identifying and then guiding persons in vulnerable situations. These initiatives are based on a system for detecting and managing risky situations, in which employees and retailers require training.

6.3.1 IN-HOUSE DETECTION PROCESSES

To detect and manage atypical and risky situations, collaborative bodies comprising representatives of the various business lines involved (including the in-house responsible gaming team) meet to address reports concerning retailers and players. These types of initiatives are aimed at directing persons in vulnerable situations to gambling support structures (SOS Joueurs, etc.) or to local healthcare or social workers such as the CSAPA (centre for the care, support and prevention of addiction). On its websites (fdj.fr and parionssportenligne.fdj.fr), FDJ also provides players with the contact details of helplines and support structures for problem gambling, which provide specialised information through channels such as the Addict'Aide internet portal developed by Fonds Actions Addiction.

In the interest of managing certain individual cases of vulnerability, FDJ encourages people to contact these organisations and/or works with them to ensure players receive appropriate care. Each of FDJ's partner helplines (SOS Joueurs, e-Enfance, Crésus and Institut du Jeu Excessif) provides specific expertise, enabling persons in vulnerable situations to find help and the tools they need.

The number of alerts flagged and the number of vulnerable gambling situations detected increased by comparison with 2021, with 222 vulnerable situations identified in 2022 out of a total of 475 cases reported and processed (compared with 132 in 2021 out of a total of 367). This is because the flagging procedures have been extended to cover all cases directly handled by the FDJ customer service department.

6.3.2 OUTREACH APPROACH

During the first lockdown in 2020, FDJ tested a proactive approach to detect potential problem gamblers, using a telephone outreach system that involved the responsible gaming teams contacting online lottery players. In 2022, FDJ was keen to build on the work of the two previous years and to capitalise on these successful trials by continuing to work with structures that provide support and help for gamblers and by ramping up and structuring the outreach campaign, extending it to players on the Parions Sport En Ligne (PSEL) website. In 2022, more than 2,000 outreach calls were made.

The outreach call approach has been developed in collaboration with the Committee of Responsible Gaming Experts and the FDJ Social Laboratory (see section 9.2 Dialogue with stakeholders), which recognise that FDJ can legitimately take a proactive approach with players within a specific ethical framework. The stakeholders have emphasised that the Company must stay within its scope of responsibility as a gaming operator and not seek to take the place of healthcare providers and support services.

(1) Players within the Playscan™ analysis scope (factors in players' habits for the past 5 weeks at a given moment in time, updated weekly).

6.3.3 RESPONSIBLE GAMING ACTION PLAN FOR THE 2022 FIFA WORLD CUP

Specifically regarding sports betting, the 2022 FIFA World Cup was staged between 20 November and 18 December 2022. FDJ took action through its Parions Sport betting brand (Parions Sport Point de Vente and Parions Sport En Ligne). It designed and implemented a specific responsible gaming action plan, which it submitted to the ANJ before the World Cup kicked off. This plan had three key focuses:

- Preventive information aimed at players and the general public regarding the risks involved in betting, namely through:
 - a television campaign reminding viewers that underage sports betting is prohibited and stressing the dangers of excessive gambling,
 - video clips posted on social media in which comedians Redouane Bougheraba and Paul de Saint-Sernin played out scenes to raise awareness about responsible gaming,
 - a trial campaign on *TikTok* focusing on the prevention of online underage gambling;
- the involvement of the commercial network in the months leading up to the World Cup, through special training programmes geared towards the sales force and points of sale that offer sports betting, focusing on preventing underage gambling and excessive gambling, and rounding out the broader responsible gaming training programmes already held;
- the detection of players in vulnerable situations through a more intense outreach campaign aimed at online players who were displaying risky gaming habits, with top priority given to players who placed bets during the World Cup, and trials at points of sale aimed at identifying problematic gamblers, in association with SEDAP.

6.3.4 RESPONSIBLE GAMING PARTNERSHIPS

The design and implementation of these various measures and systems is underpinned by a policy of forming partnerships in the field of research and prevention. This policy helps strengthen expertise and circulation of knowledge in the fields of gambling and addictive behaviour. It hinges on three main focuses:

- helplines for vulnerable players;
- research in addictive behaviour and in human and social sciences;
- initiatives and trials in harm and risk prevention and reduction.

Many papers have been written by healthcare specialists on the difficulties involved in detecting problematic gamblers and guiding them to support structures. With this in mind, FDJ has been working with researchers and addiction treatment specialists for many years to develop an experimental approach. The aim is to shore up and assess the measures in place to detect vulnerable players very early on.

6.3.5 EARLY DETECTION AT POINTS OF SALE IN ASSOCIATION WITH FÉDÉRATION ADDICTION AND SEDAP

In 2022, as public health restrictions were gradually lifted, FDJ was able to restart phase three of its harm and risk prevention and reduction trials. The aim of these trials is to facilitate early detection of vulnerable players at FDJ points of sale, using two methods: two-person teams of non-substance addiction specialists reach out to players at points of sale, and a self-support system using peer players is put in place with the help of retailers.

In 2022, CSAPAs (centres for the care, support and prevention of addiction) who were interested in taking part in the next phase of trials were invited to submit proposals. Five new centres will take part in phase three: CEID (Bordeaux), SEDAP (Dijon), Les Wads (Metz), Floréal (Aix-en-Provence) and Kairn 71 (Chalon-sur-Saône). The staff at these centres are specifically trained to identify gaming and gambling risks and to provide mental health first aid. In 2023, trials will begin at selected FDJ points of sale with a view to facilitating the detection and support of struggling players.

6.3.6 SUPPORTING RESEARCH

In 2022, FDJ continued to support the research being conducted by Dr Amandine Luquiens (CHU Nîmes) into self-exclusion. The aim is to develop efforts to reduce the risks and harm to which self-excluded players are exposed, namely by attempting to raise awareness using a personal, preventive and proactive approach (emails, outreach telephone calls, etc.).

Over the past two years, FDJ has also been supporting research into the effects of advertising campaigns, as part of a thesis being prepared by Samantha Tessier (Université Paris Nanterre) on the impact of advertising and prevention campaigns according to the psychological characteristics of players. FDJ gathered 84,000 people to respond to Ms Tessier's questionnaire.

Between now and 2025, FDJ Group will continue to develop the funding it provides to researchers and prevention structures without seeking in any way to influence them.

PERFORMANCE INDICATOR: AMOUNTS ALLOCATED THROUGH RESPONSIBLE GAMING PARTNERSHIPS

in thousands of euros	2021	2022
FDJ Group	1,234	1,385

FDJ supports researchers and associations that independently conduct studies or preventive actions, as well as structures that can help struggling players or their friends and family. In 2022, amounts paid with respect to these partnerships increased to €1.385 million:

- 17% went to helplines;
- 43% went to risk and harm prevention and reduction initiatives;
- 40% was allocated to scientific research and circulation of knowledge, particularly in the field of problem gambling, as has been the case for over a decade.

The amounts that FDJ allocates to research into addictive behaviour and risk reduction are in keeping with the application of the provisions of Article 3 of French law No. 2021-476 of 12 May 2010 on the liberalisation of competition and regulation of online gambling. Under said provisions, operators that hold exclusive rights must use at least 0.002% of the stakes they collect to finance research into problem gaming. The ANJ and OFDT (Observatoire Français des Drogues et des Toxicomanies - French monitoring centre for drugs and drug addiction) have set the conditions under which this new requirement will be enforced, particularly regarding the methodology used for selected research projects.

6.3.7 OUTLOOK

Enhancing the responsible gaming policy is a priority for FDJ Group, by pursuing an approach that is differentiated by gaming range and tailored to each player's habits. This approach will serve to adapt prevention measures in line with the specifics of the various products marketed by the Company (lottery, sports betting) and the risk profiles of players, particularly online players, whose gaming habits are more readily available and analysable.

FDJ will continue in 2023 to consistently step up its efforts in this domain, and will also take new initiatives in keeping with the three mainstays of its responsible gaming policy:

- preventing underage gambling:
 - continuing to raise public awareness of the risks, by devoting 10% of advertising spending to responsible gaming messages across all forms of media, as it did already in 2022, and by introducing new prevention material at points of sale and through its sponsorship actions,
 - ramping up inspections at points of sale, based on the penalty system determined at the end of 2021. FDJ is also trialling innovative solutions to help retailers enforce the ban on underage gambling;
- preventing excessive gambling:
 - continuing to evaluate the appeal of the gaming range and promotional initiatives by using the tools that FDJ has developed and by analysing how the risk profile of the player base has evolved,
 - pushing ahead with the implementation of player-centred prevention approaches: developing models that can analyse and predict risky online gaming patterns, giving players tools to keep their gambling in check, such as online moderation mechanisms, and determining targeted prevention actions,
 - detecting and supporting persons in vulnerable situations,
 - ramping up initiatives to detect potential problem gamblers very early on by consolidating the telephone outreach campaign for online players and continuing to support trials led in conjunction with stakeholders at points of sale to improve the early detection of such players.

To facilitate all these actions, FDJ will continue to work with and refer to its many healthcare and social partners, and particularly the Committee of Responsible Gaming Experts and the Social Laboratory.

6.3.8 SUPPORT FOR BIG PRIZE-WINNERS

In 2022, 442 customers won more than €500,000 in prize money by playing FDJ games (i.e. more than one winner every day).

FDJ invites players who win €1 million or more to take part in a comprehensive support programme, including an individual personalised welcome at the time of payment. Players are also provided with group support (free of charge and à la carte) in the form of workshops over a five-year period. The aim of the support is to take into account how winnings can impact the lives of the new millionaires, particularly in terms of financial and emotional management. These sessions give them an opportunity to learn, express their feelings and share their experiences. The programme, put together with prize-winners themselves, has evolved over the years as social norms have changed.

FDJ is one of the few lotteries in the world to offer its major prize-winners such a comprehensive support system.

In 2021, FDJ continued to adapt its support system to meet the needs and habits of prize-winners. The Group held in-person and digital workshops for players who won more than €1 million, covering a variety of themes (managing the financial and administrative implications, change management, having a positive social impact, etc.). 17 workshops were held in 2022, 3 of them remotely. FDJ also developed social impact workshops that focused on philanthropy, what it means to be a business angel and the consideration of environmental issues when making an investment.

In 2022, FDJ embarked on a plan to harmonise and optimise support for the winners of prize money of €30,000 and more. This plan includes training for all members of staff who pay out winnings at FDJ payment centres across Metropolitan France and the French overseas departments and territories. A special pamphlet has been printed for the winners of anywhere between €30,000 and €1 million. It contains information on the very first steps prize-winners should take to best handle the financial, administrative and emotional aspects of their winnings. It has a responsible gaming section to ensure that prize-winners understand the importance of playing responsibly with their new-found wealth. Added content, in the form of video clips, is being developed for the winners of €500,000 or more.

Support for big prize-winners allows FDJ to get to know its customers and their habits better. When the Company identifies a big prize-winner who presents a risk of excessive gambling behaviour, the payout can be an opportunity to raise awareness of the added risks arising from the winner's new financial circumstances. In cases like these, a member of the responsible gaming team can be asked to attend the payout.

7. Integrity

FDJ pursues a proactive policy to effectively prevent its games from being used with fraudulent or criminal intent, for money laundering or to finance terrorism. Fully aware of the wide range of risks to which it is exposed, FDJ is committed to introducing effective and innovative measures to prevent such risks from emerging and to reinforce trust in its gaming model in an increasingly stringent regulatory

environment. With this in mind, FDJ Group maintains a continuous dialogue with the industry regulator (ANJ) and with TRACFIN, the French agency responsible for collecting financial intelligence, which has noted a steady improvement in the relevance and quality of the information that FDJ has reported to it in recent years.

7.1 COMBATING GAMBLING FRAUD

As a gaming and gambling operator, FDJ is exposed to multifaceted risks of fraud liable to arise at different stages in the game marketing process. Combating fraud is one of the basic objectives assigned to FDJ in its role as an operator. A list of requirements defines the measures applicable to the Company.

In 2022, FDJ secured its system for accessing player accounts and assets using a multi-factor authentication (MFA) process, which is an effective way to prevent data theft, identity theft and fraudulent use of player accounts.

The ANJ has endorsed FDJ's action plan to tackle fraud, money laundering and terrorist financing. The regulator has found that the actions taken by FDJ in all its activities, regardless of whether they are operated under exclusive rights or under licence, are evidence of the Group's willingness to meet the objectives it has been given to combat fraud and money laundering.

7.1.1 ANTICIPATE

All of the Company's plans in terms of products, infrastructure, systems, operating methods, regulations and publications are analysed by the Security department in order to identify fraud risks as early as the design stage. For the purposes of marketing its games, FDJ's approach is based on a risk analysis calling for:

- incorporation of any vulnerabilities, including any risks inherent in each product range or process;
- knowledge and analysis of threats associated with contributing parties, marketing methods and distribution channels, and conditions for intervention;
- identification of potential gaming fraud scenarios in order to ensure native robustness.

By implementing this system, FDJ can make sure previously identified scenarios are kept in check, and new risk scenarios associated with the plan are analysed.

7.1.2 MONITOR

FDJ has established indicators to keep track of gaming activities in real time. The real-time fraud detection system serves to raise the alert, identify circumstances and means of fraud, and trigger corrective actions.

7.1.3 CONTROL

Apart from real-time detection, the three-pronged approach also provides for ex-post checks. Various data is cross-checked to highlight unusual situations that will then be analysed for the purpose of classifying the fraud. Acts of gaming fraud and attempted gaming fraud are addressed in three ways:

- precautionary measures. Protective measures are taken immediately upon detecting situations indicative of fraud risk or the perpetration of gaming fraud: game sales and prize payouts are suspended, player accounts are blocked, gaming products are withdrawn, etc.;
- cooperation with the authorities. A complaint is filed with the competent authorities where there is a clear case of fraud;
- responsibility of actors. The contract entered into between FDJ and its retailers requires that the latter comply with the relevant procedures and obligations to combat criminal activity, fraud and money laundering. The wide range of material provided to retailers clearly explains the procedures they are required to implement. A penalty system shall apply where there is a failure to satisfy these obligations. The discovery of a case of fraud may lead to the termination of FDJ's contract with the retailer, depending on the severity of the facts of the case. Furthermore, a 0.2% bonus is granted to retailers that observe transparency measures, apply good commercial practices and display any diligent behaviour that enhances the security of the relationship between FDJ, the retailer and the player.

7.1.4 OUTLOOK

In 2023, FDJ will continue to transform the organisation it has put in place to tackle fraud, with a particular emphasis on risk prevention and issues relating to the integrity of its gaming range, two fundamentally important areas.

FDJ will also adapt its risk detection system to the new games and products it has developed. A system of checks has been introduced for the online poker game launched at the end of 2022 that is specifically adapted to the risks identified for this vertical. The internal control entities will verify the efficiency of the mitigation measures put in place in response to these risks.

Training for employees, the sales force, service providers and retailers will also be continued.

PERFORMANCE INDICATOR: FRAUD RATE (NON-PAYMENTS) ON REMOTE DEBIT CARD PAYMENTS

	2021	2022
FDJ	0.009%	0.004%

The fall in the rate of fraud is mainly tied to the introduction of tighter FDJ checks before the player registration and authentication process. Added to that, FDJ has introduced an anti-fraud tool and has teamed up with Monext's fraud analysts to help its fraud teams identify and handle cases of fraud with even more accuracy. FDJ is still well below the national fraud rate of 0.196%⁽¹⁾ in 2021 (taken from the most recent annual report published by the OSMP – Observatory for the security of payment means)

7.2 PREVENTING MONEY LAUNDERING

The gaming and gambling industry is exposed to money laundering risks. It is one of the non-financial professions subject to the anti-money laundering obligations laid down by the French monetary and financial code (*Code Monétaire et Financier*). The stakes and challenges involved in combating the use of FDJ services and products for money laundering are critical in a constantly changing and increasingly demanding legal and regulatory environment. In addition to complying with the strict regulatory obligations to which it is subject in the fight against money laundering, FDJ works to maintain an upstanding gaming environment by actively combating criminal organisations.

Money laundering risks can be heightened in offline gaming activities, as the players are anonymous and substantial cash volumes are in circulation. With this in mind, as sports betting is a game of skill, there is greater exposure to the risk of games being used for money laundering.

In response to such a threat, FDJ has introduced suitable anti-money laundering and counter-terrorist financing (AML-CTF) measures ⁽²⁾ using a risk-based approach. This involves identifying and measuring the risks to which it is exposed. FDJ classifies risks by taking into consideration the activity, the type of customer, the ranges and products involved, the transactions, the distribution channels used and, for the offline business through points of sale, the location and type of points of sale. Each year, it submits its AML-CTF action plan for the following year to the ANJ.

The Security department is responsible for implementing the AML-CTF measures through prevention, monitoring and controls. The operational structure works to detect and examine potentially suspicious activity ("anomalies") observed across all transactions and gaming operations, conducted online and in points of sale.

In 2021, the new AML-CTF reference framework contextualised and clarified some of the provisions of the French monetary and financial code applying to FDJ. In January 2022, FDJ submitted its annual action plan to tackle fraud and money laundering to the ANJ. This plan had four key focuses:

- consolidating the risk-based approach to enable suitable vigilance procedures to be implemented;

- using data to perfect anomaly detection and risk prevention;
- raising awareness about the risks of money laundering among all FDJ retailers;
- enhancing the internal control system to be able to assess, at all times, the compliance and efficiency of the measures put in place to combat fraud, money laundering and terrorist financing.

The ANJ approved of the actions contemplated in this area for 2022 and underlined that some measures marked considerable progress in the efforts made to tackle fraud, money laundering and terrorist financing. The FDJ plans to:

- take its risk-based approach even further by fine-tuning the analysis of financial movements and payment instruments used by players; and
- step up training and internal control.

7.2.1 PREVENTION

An assessment of money laundering and terrorist financing risks is performed whenever a new game is designed and a new service taken to market, in a bid to prevent, reduce or eliminate previously identified risks.

Training and empowering employees and retailers is also one of the keys to risk prevention.

Explanatory content has been designed and incorporated into the CSR training programme to help familiarise all members of staff with the risks of money laundering. This content was updated in 2022. Additional training is held for staff members with the greatest exposure to money laundering and terrorist financing (ML-TF) risks because of the duties they perform, in order to help them acquire a deeper understanding of these risks, so that they can identify and prevent them.

Ahead of the 2022 FIFA World Cup and to prevent the risks involved when such an event is staged, FDJ was particularly attentive to raising awareness of staff working at its SDCs (commercial development companies), who are entrusted with key sales and marketing duties.

(1) Source: https://www.banque-france.fr/sites/default/files/medias/documents/rapport_osmp_2021.pdf

(2) Pursuant to the Order of 9 September 2021 defining the reference framework to combat fraud, money laundering and terrorist financing (JORF No. 0215 of 15 September 2021).

In 2022, FDJ continued with its three-year plan to train all retailers in its network by the end of 2023. As part of its ongoing training initiatives, FDJ ensured that nearly 900 retailers were able to complete refresher courses in this area in 2022.

It also regularly calls retailers' attention to money laundering/terrorist financing risks by publishing a wide range of content on this topic (e.g. on the Parions Sport point-of-sale app for retailers, or in the Profession Jeux magazine, etc.).

FDJ asked a representative sample of 1,000 retailers to complete a survey for the fourth year in a row to ascertain how familiar they were with money laundering risks and their associated obligations. Overall, 82% of retailers were found to be well-versed in these issues (stable on 2021).

7.2.2 MONITOR

The legal and regulatory framework requires gaming and gambling institutions to establish a transaction monitoring system based on KYC ("Know Your Customer") methods and the detection of suspicious transactions.

FDJ introduced a system several years ago to detect anomalies liable to constitute point-of-sale money laundering activities. The system relies on an extensive volume of data to determine a point-of-sale (PoS) score according to multiple risk criteria.

In the sports betting segment, FDJ is continuously improving its resources for detecting and countering suspicious activity. It has set up a system that constantly monitors betting. If an anomaly is detected, an alert is raised in real time, resulting if necessary in an extensive analysis aimed at clarifying the circumstances and identifying the risks involved. In 2022, particular attention was paid to bets placed on FIFA World Cup matches.

These vigilance procedures involve enhanced investigations to assess a risk of money laundering and, where necessary, report any suspicious activity to TRACFIN, the French agency responsible for collecting intelligence and combating unlawful financial activity. In 2022, the Group filed 357 suspicious transaction reports (up from 282 in 2021). In the past few years, TRACFIN has regularly expressed satisfaction at the high standard of the reports filed by FDJ.

RESULT: NUMBER OF SUSPICIOUS TRANSACTION REPORTS FILED WITH TRACFIN

	2021	2022
FDJ Group	282	357

The sharp rise in suspicious transaction reports can be attributed to the increase in digital activities and, in particular, a number of online customer records for which FDJ has no information on the origin of the funds.

7.2.3 CONTROL

Enhanced reviews conducted in the interests of due diligence may at times call for PoS inspections. In such cases, the inspectors go on-site to collect circumstantial data that can often be used to classify money laundering suspicions. On-site inspections also provide an opportunity to determine if retailers are meeting their regulatory and contractual obligations.

Checkpoints related to security and responsible gambling obligations are also planned. The point-of-sale compliance rate was 94.8% in 2022, up slightly on the 93.8% recorded for 2021 (see section 6 Responsible gaming). FDJ has set a goal to keep this rate above 90% by 2025.

PERFORMANCE INDICATOR: OVERALL COMPLIANCE WITH RESPONSIBLE GAMING AND SECURITY CRITERIA

	2021	2022
FDJ Group excl. PDJ	93.8%	94.8%

The overall compliance of points of sale is assessed with regard to behavioural, commercial, contractual and regulatory criteria. *The increase in the rate of compliance stems from better application of the criterion that requires points of sale to hand losing tickets and slips back to players on request. This instruction has been given to points of sale for many years now in conjunction with the representatives of retailers and the sales force, and has all but done away with unsuitable practices at points of sale.*

In 2022, FDJ stepped up its AML-CTF internal control mechanism by implementing the second-level permanent control plan and preparing a new framework for self-assessment of internal control measures by the line managers. In this way, the second line of defence continuously monitors the compliance and efficiency of the AML-CTF measures put in place.

7.2.4 OUTLOOK

FDJ is drawing on its annual money laundering action plan to develop an innovative approach that harnesses data to make its anomaly detection system even more effective. It embarked on a far-reaching data project in 2020, with a particular focus on money laundering and terrorist financing. In 2023, FDJ will continue to integrate and centralise data that will be useful to create new risk indicators, coinciding with a major transformation in its information system architecture.

FDJ will adapt its AML-CTF measures to take account of its new gaming products and related threats. As part of this, it will step up its constant vigilance procedures regarding customers and transactions in order to rise to the challenges brought about by more intense digital gaming activity, particularly with the launch of an online poker game. In 2023, FDJ will continue to develop the specific measures and checks introduced to monitor the new ways in which players use its services.

7.3 PREVENTING THE OUTSIDE MANIPULATION OF SPORTS COMPETITIONS

As a sports betting operator and long-standing supporter of French sport, FDJ Group is committed to combating the outside manipulation of sports competitions. As a cycling sponsor, it has been working to eradicate doping since 1997.

In the course of its activities in the sports industry (sports betting products and sports partnerships), the Group is directly exposed to the risk of manipulation. Because such manipulation can undermine confidence in athletic competitions and in the integrity of sports betting, this warrants a strong response from FDJ.

FDJ Group has been deeply committed for many years to tackling the manipulation of sporting events around the world, often linked to fraudulent betting. French decree No. 2019-1060 of 17 October 2019 consolidated the tasks assigned to FDJ by the State, particularly regarding the installation of the tools required to detect sports betting anomalies, prevention programmes targeting sports industry professionals, and FDJ's participation as a member of the French national platform to combat the manipulation of competitions.

The Group works alongside European and global lottery associations to establish national and international cooperation with the sporting movement and government authorities aimed at improving the effectiveness of sports integrity policies.

7.3.1 PREVENTION

A broad plan to promote the integrity of athletic competitions has been implemented on several fronts. The Group carries out internal awareness-raising and training initiatives to combat manipulation through regular communication with all employees and special training for employees working directly or indirectly in sports betting activities.

In 2022, awareness-raising initiatives were carried out again with representatives of the French basketball federation and the French handball federation, representatives of the Olympique de Marseille and Olympique Lyonnais football clubs, as well as with young players at a number of training centres involved in the Open Football Club programme. Similar initiatives were taken with the French tennis federation and the French rugby federation, as well as with Paris Saint-Germain football club, all of them new FDJ partners.

In 2022, these efforts helped more than 960 sports professionals to understand the risks of manipulation in sports competitions and know how to respond should they be confronted with attempted manipulation.

The Groupama-FDJ cycling team plays an active part in the fight against doping and is recognised for its commitment. As a cycling sponsor since 1997, FDJ's attitude as a responsible sponsor is reflected in its strong focus on raising awareness among cyclists and their managers about the importance of ethics and integrity (zero tolerance for doping). One of the preventive measures implemented has been the daily collection and analysis of cyclists' power

output data. In addition to the controls imposed by the International Cycling Union (UCI), anti-doping checks are also performed by the medical unit for the Continental and World Tour teams.

In 2022, the members of the Groupama-FDJ cycling team participated in an awareness session on the manipulation of sporting competitions.

FDJ is also a founding member of MPCC (movement for trustworthy cycling) ⁽¹⁾, through which it runs a sponsors programme, and is behind the Sponsors' Charter, under which sponsors agree not to exert pressure on sporting results.

The "Signale!" secure website for reporting manipulation suspicions, set up by FDJ, has been up and running since July 2021 and can be used by anyone involved in the French sporting movement.

There are plans to extend "Signale!" in the medium term so that other types of acts can be reported that are harmful to the integrity of sports and athletes. This is something that the sports ministry is working on with the partners involved in the national platform, the French anti-doping agency and the discrimination ombudsman (Défenseur des Droits).

In 2021, the Company became a member of the Esports Integrity Commission (ESIC) through its subsidiary DVRT 13. ESIC is a self-regulating international association that promotes and monitors competitive integrity in esports.

7.3.2 MONITOR

Monitoring of sports betting in the offline distribution network led FDJ to submit 12 major anomaly alerts to the national platform in 2022 (down from 24 in 2021).

FDJ was appointed vice-president of the Global Lottery Monitoring System's (GLMS) Executive Committee in June 2021. GLMS is an association of international lotteries that pools its sports betting monitoring data. In this new capacity, FDJ is continuing its efforts to make international competition oversight more effective in the interest of sports integrity. FDJ participated alongside GLMS in the enhanced surveillance conducted during the 2022 FIFA World Cup.

A decision to change the GLMS name was made at its general meeting at the end of 2022: it is now called ULIS, which stands for United Lotteries for Integrity in Sports. This new name translates the association's broader role, which now goes beyond a monitoring role during sports competitions and includes prevention actions and international cooperation with the sporting movement and public authorities.

PERFORMANCE INDICATOR: NUMBER OF ALERTS TRANSMITTED TO THE NATIONAL PLATFORM

	2021	2022
FDJ Group	24	12

(1) A movement designed to defend clean cycling, transparency and accountability, that strives to rally its members behind these causes.

7.3.3 COOPERATION

In the international arena, following on from the Council of Europe's KCOOS+ (Keep Crime Out of Sport+) programme, FDJ continued to provide financial and human resources as part of the new ACT (Addressing Competition Manipulation Together) programme. The three-year ACT programme is designed to facilitate the implementation of the Council of Europe Convention on the Manipulation of Sports Competitions, also known as the Macolin Convention, the aim of which is to harmonise international regulations and practices to combat the manipulation of sports competitions.

As a member of the French national platform, FDJ is also a stakeholder in the Copenhagen Group, steered by the Council of Europe, which comprises around 30 national platforms. The Copenhagen Group is aimed at facilitating operational cooperation between existing platforms and helping to create new national platforms. In this way, it is working on the practical implementation of the Macolin Convention.

FDJ is also a driving force in the lottery industry, being Executive Chair of The European Lotteries' Sport Working Group and representing Europe's lotteries on the World Lotteries Association's Betting Integrity on Sports Committee.

7.4 PERSONAL DATA PROTECTION

In this era of fast-paced digital transformation, when customers want to have more control over their data and be safe in the knowledge that their data is being managed correctly, as a digital operator, FDJ has made data privacy for customers and users a top priority.

Application of the EU's General Data Protection Regulation ("GDPR") took effect on 25 May 2018 and laid down the main principles and requirements for personal data protection in Europe, such as transparency, integrity, confidentiality of data processing operations conducted by data controllers, and the new rights of data subjects over their personal data.

Developing knowledge of customers to better meet their needs is strategically important for FDJ Group, and necessitates more data gathering and more data mining. In the course of operating its business, FDJ relies on industry best practices and draws on multiple resources to protect the security and confidentiality of all Group data (especially personal data) against potential security breaches.

7.4.1 INFORMATION SYSTEM SECURITY

Data protection, particularly personal data protection, is one of the pillars of the information system (IS) security strategy laid out in the Group Information System Security Policy. This strategy aims in particular to protect the personal data of players, retailers, employees and applicants.

FDJ implemented its information security management system (ISMS) in 2008 and had it ISO 27001-certified. The FDJ ISMS covers all the activities of the FDJ parent company together with those of its development subsidiary FDJ Gaming Solutions France. As part of the ISMS, the Security teams conduct multiple risk analyses aimed at verifying that the data protection measures in place are commensurate with the needs of the business lines and the requirements set forth in the Group Information System Security Policy (GISSP). Data protection, particularly personal data protection, is one of the pillars of the IS security strategy laid out in this policy, regardless of whether the data belongs to customers, retailers, employees or applicants. The personal data protection policy goes into specific detail on FDJ's data protection requirements. The Group has published a

"Privacy" charter on its corporate website in which it highlights its commitments regarding data privacy for customers, the types of data it gathers and the manner in which this data is used.

Multiple security measures have been implemented based on industry best practices, policies drafted by the Information System Security entity or risk management plans addressing risks identified during the various ISS analyses performed annually or for the purposes of completing specific projects. FDJ introduced enhanced authentication measures on its websites fdj.fr and parionssportenligne.fdj.fr in 2021, together with partial personal data masking in players' online accounts. FDJ continued its efforts in 2022 by introducing two-factor authentication (2FA) systems for sensitive operations in player accounts (e.g. to change bank details) and by requiring more complex passwords.

FDJ regularly updates the set of standard security measures used to protect personal data. Furthermore, as a general rule, information security awareness is a cornerstone of FDJ's security programme, ensuring that best practices are adopted by all employees.

7.4.2 EMPLOYEE AWARENESS AND TRAINING INITIATIVES

In 2022, FDJ asked its staff to take part in online surveys that take around 40 minutes to complete as part of an innovative awareness campaign. The storyboard developed for the campaign put the employee in the shoes of a security researcher, helping them to understand the impacts of a failure to follow best practices regarding personal data security and protection. Three such surveys were conducted and completed by 531 employees.

One particular module in the employee CSR training programme relates to the General Data Protection Regulation (GDPR). FDJ has also incorporated mandatory GDPR awareness training into its onboarding programme for new hires. More than 200 new members of staff completed this training in 2022.

7.4.3 ROLL-OUT OF THE PRIVACY BY CUSTOMER APPROACH

FDJ has implemented a cross-business GDPR compliance project and established governance aimed at maintaining compliance and staying ahead of changes in laws and regulations governing personal data protection. The goal is to optimise transparency of personal data processing operations. In 2017, the Group launched a "Privacy by Customer" initiative, which relies on innovative tools and methods for collecting user feedback, in order to better understand their perceptions, needs and expectations in terms of personal data protection. As part of this, FDJ conducts qualitative in-person surveys of players, non-players, user experience specialists and legal advisors. This iterative approach will continue long into the future, and the findings will be shared with other companies belonging to industry associations, and with the CNIL (French data protection agency). FDJ understands that it is also imperative to protect the personal data of its staff and retailers.

FDJ is constantly improving the process for obtaining user consent to install cookies and other online tracking technologies. It has internal procedures in place to ensure that it complies at all times with the laws in force, and it performs regular audits of its websites and mobile applications.

FDJ also keeps a data processing log that records all personal data processing operations. This database documents cross-business, technical and organisational security measures implemented by the Company. The ultimate goal is to protect all personal data processed by FDJ and to guarantee the integrity, confidentiality and availability of personal data transiting through FDJ's information system. To ensure compliance at all times, FDJ also conducts checks on personal data processing and on the manner in which this processing is carried out.

Lastly, FDJ applies security best practices in terms of:

- user information and awareness: persons who handle personal data are duly informed and made aware of the associated risks. They are required to sign a confidentiality agreement in their employment contract, together with the charter governing the use of

IT resources and digital tools, which addresses data privacy and is appended to the Rules of Procedure. This charter is presented to all new employees as part of the general security awareness process conducted by the Security department;

- monitoring and tests: there can be multiple threats taking a variety of forms: cyber attacks, sensitive data leaks, unlawful behaviour, denial-of-service attacks, fraudulent bank transactions, identity theft, personal data theft, etc. To address this wide range of threats, FDJ has installed tools to monitor and test the various components of its information system;
- identification, authentication, authorisation and traceability of user activities;
- encryption and use of cryptography tools;
- incident traceability and management;
- vulnerability management;
- secure access to personal data.

FDJ is especially vigilant not to disclose prize-winners' identity to external third parties, particularly the media in pursuit of stories on big prize-winners.

7.4.4 OUTLOOK

In 2023, FDJ will continue to enhance player account security by extending the scope of protected functions through two-factor authentication.

PERFORMANCE INDICATOR: NUMBER AND SHARE OF FDJ EMPLOYEES TARGETED BY GDPR AWARENESS INITIATIVES*

	2021		2022	
	Number	Share	Number	Share
FDJ	2,061	76%	235	8%

* In 2021, all employees were required to complete this training. It was incorporated into the training cycle for new hires in 2022. As a result, the 2022 figure essentially factors in awareness sessions completed by new hires and employees who had not completed the CSR programme the previous year.

7.5 PROMOTING ETHICAL BUSINESS MANAGEMENT AND FIGHTING CORRUPTION

FDJ Group is subject to the French Sapin II law and, as such, is required to implement a programme to prevent and detect corruption and influence peddling⁽¹⁾.

Efforts to prevent and detect acts of corruption concern every member of the FDJ Group. They are championed by Executive Management, coordinated by a special entity that belongs to the Audit, Risk, Control, Quality and Ethics department, and implemented throughout the Group with the help of experts and compliance officers.

FDJ has also been working closely with its partners and stakeholders for many years to combat corruption in sports (see section 7.3 Preventing the outside manipulation of sports competitions).

7.5.1 ANTI-CORRUPTION MEASURES AT FDJ GROUP

The Group's anti-corruption measures hinge on an Ethics Charter, an Anti-Corruption Code of Conduct, specific procedures and an ethics-driven whistle-blowing system.

In the course of conducting its business and, as stated in its Ethics Charter ⁽²⁾, FDJ Group observes the fundamental ethical principles of complying with laws and regulations, sharing a culture of integrity, respecting employees and stakeholders, and engaging in constructive dialogue with civil society. The Ethics Charter has been approved by FDJ Group's Board of Directors and reflects the collective engagement of the Group's executives and employees to uphold its ethical principles in the performance of all their duties. Tackling corruption is a key element of these principles.

The Anti-Corruption Code of Conduct is an extension of the Ethics Charter ⁽³⁾ in accordance with French laws and standards and international commitments.

The Code of Conduct is available on the Group's corporate website and a copy is given to each FDJ Group employee. The Anti-Corruption Code of Conduct provides guidance to FDJ Group employees and stakeholders on how to respond to and address corruption on a daily basis, by presenting situations that might equate to corruption, influence peddling and other breaches of fairness, and by describing what to do and what not to do in order to adopt the correct attitude when faced with a high-risk situation.

The anti-corruption measures applied at FDJ Group ensure that the "zero tolerance" principle is upheld regarding any act of corruption, a principle that is conveyed by the Group's governing body and formally stated in the message from the Chairwoman and Chief Executive Officer in the

Anti-Corruption Code of Conduct. This code is supplemented by in-house rules and procedures made available to staff. These relate to:

- handling gifts and invitations, and the associated register;
- preventing, reporting and managing conflicts of interest, and the associated register;
- third-party assessments for the entire Group, including the management of charitable sponsorship, sports sponsorship, institutional relations and the representation of interests (the Group has a strict principle of political neutrality in all its operations).

The Group's anti-corruption measures are supplemented by awareness initiatives (e-learning module open to all staff), specific training for populations with the greatest exposure to a risk of corruption and influence peddling, and communications (newsletter, anti-corruption day, posting of articles on the Intranet portal, etc.).

The Group's anti-corruption measures are also supplemented by an accounting audit procedure and control plan to help us ensure that the measures are indeed effective.

Lastly, in order to maintain and nurture a trusting environment, FDJ Group introduced a whistle-blowing system for employees and external stakeholders in 2018.

This whistle-blowing system is a way to encourage employees and external stakeholders to escalate any suspicions they may have and report any ongoing that may be against the law, in breach of the Anti-Corruption Code of Conduct or, more generally, contrary to the Group's ethical principles. Rounding out the Group's conventional feedback and dialogue channels (Diversity & Inclusion team, employee representation bodies, HR business partners, managers, etc.), the ethics-driven whistle-blowing system relies on a secure online platform managed by an outside contractor (WhistleB), which guarantees the protection of data and has strict privacy procedures in place for all data gathered on reported cases (in relation to the identity of the whistle-blower, the persons targeted and any third party cited, and in relation to the ongoing reported). Staff at all Group subsidiaries can avail of this online platform, which can be accessed from the corporate website and through the Intranet portal.

The system of governance in place within the Group provides assurances that reported cases will be collected and handled in an independent and impartial manner (no conflict of interest with the persons involved). The Audit, Risk, Control, Quality and Ethics department is responsible for ensuring that cases are handled correctly and smoothly.

(1) FDJ Group's subsidiary in the United Kingdom must also comply with the UK Bribery Act, which contains measures to prevent and punish corruption. The Act makes it an offence to engage in active bribery and passive bribery, and to fail to prevent a bribe being paid on an organisation's behalf. The rules and procedures associated with anti-corruption measures can therefore be adapted to this legislation.

(2) The Ethics Charter and Anti-Corruption Code of Conduct can be found on the Group's website at: www.groupefdj.com.

(3) The Ethics Charter and the Anti-Corruption Code of Conduct are appended to the Rules of Procedure and are available for all Group employees to consult.

7.5.2 ANTI-CORRUPTION PROGRAMME AT FDJ GROUP

In accordance with the provisions of the Sapin II law, the anti-corruption and influence peddling programme rests on three pillars:

- **a commitment from the governing body** to transparency and leading by example, founded on observance of the regulations and the most exacting standards of ethics, with “zero tolerance” for acts of corruption in any shape or form; the head of the Audit, Risk, Control, Quality and Ethics department, who reports to the Group’s deputy chief executive officer, also reports to the Audit and Risks Committee;
- an analysis of **the risks of corruption and influence peddling** to which the Group is exposed, by **mapping corruption risks** to identify what measures and procedures should be put in place to prevent, detect and address these risks;
- the implementation of measures and procedures to **prevent, detect and address** risks:
 - prevention through an Anti-Corruption Code of Conduct and related procedures, a training programme on the risks of corruption and influence peddling and the implementation of a third-party assessment procedure,
 - detection through accounting audits, an ethics-driven whistle-blowing system and an internal control and assessment mechanism,
 - actions to address risks through a system of disciplinary procedures relating to corruption risks.

The Group continued or embarked on the following key actions in 2022:

1. furthering the governing body’s engagement, symbolised by:
 - the Group Risk Committee’s contribution to and approval of the 2022 corruption risk-mapping exercise and related action plans. This committee is made up of members of the Group Management Committee,
 - the implementation of key indicators to enable the governing body to verify that the Group’s anti-corruption procedures are working properly,
 - the completion of training by all members of the Group Management Committee as part of the anti-corruption programme, hosted by outside specialists;
2. an updated ethics-driven whistle-blowing system following the entry into force of the French law transposing the European directive on the protection of persons who report breaches of Union law (Directive (EU) 2019/1937). Changes to the Group whistle-blowing system were presented to the employee representation bodies with a view to having the system’s existence mentioned in the various internal rules of procedure. The system is supplemented by a procedure that explains the steps to be followed, the scope of application and the process for gathering and processing alerts;
3. continuing to roll out the multi-level control mechanism:
 - accounting audits and internal controls on the anti-corruption system to gain assurances that the procedures contained in the anti-corruption

programme are effectively implemented, in a satisfactory and efficient manner,

- stronger and automated controls through increasing data analysis;
4. stepping up awareness and training initiatives, with:
 - the organisation of an anti-corruption day focused on preventing, detecting and combating corruption (with a word from the FDJ Group Chairwoman and CEO, a chance to talk to in-house and outside specialists, an immersive game and special displays),
 - updated training material to facilitate the acceptance of key messages by staff who are exposed to corruption risks, and fresh content (graphic displays, anti-corruption newsletter, etc.);
 5. continuing to support business lines, subsidiaries and newly-acquired entities. The Ethics & Anti-Corruption team has also stepped up anti-corruption procedures at all Group subsidiaries through a community of internal liaison officers.

PERFORMANCE INDICATOR: NUMBER AND SHARE OF EMPLOYEES HAVING COMPLETED ETHICS AND ANTI-CORRUPTION TRAINING

	2020-2021		2021-2022	
	Number	Share	Number	Share
FDJ Group	2,094	77%	2,193	78%

The number of people trained represents the number of employees who completed anti-corruption training in 2021 or 2022. This is because, in 2021, the FDJ Group employees were included in the CSR training programme, which incorporates the anti-corruption module. In 2022, this programme also became mandatory for all new hires. The Ethics & Anti-Corruption team also continued to stage special training sessions for employees or subsidiaries with the greatest exposure to corruption risks.

7.5.3 OUTLOOK

Efforts in 2023 will predominantly focus on:

- enhancing the Group’s ethics-driven whistle-blowing culture;
- monitoring the action plans identified in the corruption risk map;
- continuing to provide special training to populations identified as presenting the greatest exposure to risks of corruption and influence peddling (in-person training, manager training, etc.);
- added support for subsidiaries and all other Group entities, particularly with the development of new activities and international expansion;
- rolling out digital tools to make it easier for staff to embrace our anti-corruption programme, particularly when it comes to assessing third parties;
- staff contribution to addressing Environmental, Social and Governance (ESG) issues.

7.5.4 RESPONSIBLE TAX POLICY

FDJ has made transparency and tax compliance the priorities of its tax policy. The Group takes care to comply with all the tax rules and laws that apply in all the countries in which it operates. In particular, all tax returns required by laws and regulations are duly filed, and all taxes and levies are paid accordingly.

With regard to cross-border transactions, FDJ complies with the OECD guidelines and ensures that the transfer pricing policies implemented within the Company comply with the arm's length principle.

To avoid artificial transfers of profits, the Group applies the arm's length principle, which aims to ensure that transactions within an international group are priced as if they had taken place between independent parties.

In 2022, the Group's tax expense amounted to €113.3 million, compared with €122 million in 2021. This corresponds to an effective tax rate of 27%, compared with 29.7% in 2021. FDJ SA's contribution to Group tax was €103 million, down from €119 million in 2021.

PERFORMANCE INDICATOR: EFFECTIVE TAX RATE

	2021	2022
FDJ Group	29.7%	27%

7.5.5 PROTECTION OF PLAYERS AND RESPONSIBLE GAMING

Partnerships formed for research and trials are an essential pillar of FDJ's responsible gaming policy (see section 6.2 Preventing excessive gambling). They contribute to research and the sharing of knowledge in the field of gambling and addictive behaviour, and form a foundation for the Company's work on responsible gaming mechanisms geared towards players. Each project undergoes a prior review process to gain assurances that the research and the structures being supported will be independent. This implies:

- the examination of projects in accordance with the Sapin II law (identification of potential concerns such as conflicts of interest, etc.);
- systematic referral to an internal project selection committee comprised of the Audit, Risk, Control, Quality and Ethics department and the legal, finance and CSR departments (see the ethics policy above);
- no participation by FDJ Group in the governance of projects dedicated to research on addictions and prevention of underage gambling;

- respect for the independence of the scope of research and professional practices of each partner. A specific ethical framework has also been defined for risk and harm reduction initiatives targeting struggling players, and involving professionals from the medical and social services spheres and the Group's sales network (see section 6 Responsible gaming).

7.5.6 OUTLOOK

FDJ will continue to apply these ethical guidelines in 2023 to all new partnerships formed to conduct research and to support prevention initiatives as part of its responsible gaming policy.

7.5.7 PREVENTION OF ANTI-COMPETITIVE PRACTICES

FDJ operates under exclusive rights (online lotteries, offline lotteries, offline sports betting) as well as in open competition (online sports betting) in the gaming and gambling sector. In recent years, the Group has diversified its activities and launched initiatives in new competitive and/or developing markets, namely third-party payments, esports, online entertainment games and the provision of services to international lottery and sports betting operators. Given the monopoly held in the large majority of its activities, this duality of operations exposes the Company to greater risks under competition law, particularly in terms of abuse of a dominant position.

FDJ has prepared an employee handbook to prevent risks of non-compliance with competition law. This handbook describes situations that could pose a risk for the Company, as well as the best practices employees can adopt to avoid any breaches of competition law.

The Group continued to provide training in this area in 2022 and updated the competitive practices handbook to incorporate a section on abuse of collective dominance.

FDJ also notified the Autorité de la Concurrence (French competition authority) of its plans to acquire ALEDA, a provider of point-of-sale (PoS) systems and processing solutions. On 14 November 2022, the Autorité de la Concurrence authorised FDJ to acquire ALEDA on the condition that FDJ made good on certain commitments to strictly separate the activities in which it holds a monopoly and those conducted in open competition. On 17 November 2022, FDJ announced that it had entered into an agreement to acquire ZEturf, which provides online horse-race betting and online sports betting services under the Zebet brand. This agreement is subject to the acquisition receiving a green light from the Autorité de la Concurrence, which is expected to announce its decision at the end of H1 2023.

7.6 PROMOTING RESPONSIBLE PURCHASING

FDJ Group's purchases are strategically important to meet the challenges involved in corporate social responsibility. The Group's purchasing policy is built on four pillars: supplier relations, responsible purchasing, economic performance and risk management.

In the course of its activities and business relations, FDJ promotes responsible sales and partnership practices and works to prevent unethical practices (human rights violations, adverse impacts on the environment, overly-long payment times, excessive levels of dependency, etc.) among its suppliers and partners.

The responsible purchasing policy contains a number of focuses: lasting and balanced relationships with suppliers, the shortening of payment times, local and inclusive procurement and, lastly, the improvement of suppliers' environmental and labour practices.

7.6.1 LASTING AND BALANCED SUPPLIER RELATIONSHIPS

The Group is committed to building balanced, lasting relationships with its suppliers to ensure the continuity and fairness of its value chain. In 2014, FDJ signed the inter-company mediation responsible supplier relations charter, the aim of which is to raise awareness among economic agents about key responsible sourcing issues and the importance of forging customer-supplier relationships of the highest standard. FDJ reasserted its commitment to this issue in 2021 by signing an updated version of the sustainable procurement and supplier relations charter⁽¹⁾.

In a reflection of its efforts to continuously improve its sustainable procurement practices, FDJ secured the "sustainable procurement and supplier relations" label in 2021. This label is awarded by the French ministry of the economy, finance and the recovery for a three-year period to reward best practices in procurement and supplier relations through the incorporation into purchases of CSR-driven environmental, social and ethical dimensions. It is aligned with the guidelines set out in ISO 20400.

The Group-wide policy was consolidated in 2022 through a series of actions:

- preparation of a mapping tool with AFNOR Développement with a view to formally defining a supplier CSR risk matrix;
- training for all buyers to help them integrate CSR considerations throughout the entire procurement process and manage supplier CSR risks;
- training for all buyers to ensure that they factor in total cost of ownership (TCO) and social and environmental externalities when they perform a financial review of bids submitted as part of a request for proposals;
- gauging of the environmental and social impact of the activities performed by suppliers and service providers through CSR performance assessments, e.g. Ecovadis assessments and CSR surveys. In 2022, FDJ assessed 116 strategically-important and major suppliers. On average, the suppliers assessed in 2022 scored 64/100⁽²⁾ in the four social, environmental, ethics-related and responsible purchasing categories;

- extension, in conjunction with a specialised partner, of counselling for suppliers that have been hit hardest by the public health crisis, as part of the "FDJ is committed" programme. The crisis has affected some of the Group's suppliers and service providers and this initiative follows on from the financial support mechanisms in place for the past two years. The programme is designed to improve the quality of life at work and the work/life balance of the Group's suppliers. Psychologists, social workers and coaches are on hand to help them in all aspects of their lives. The service is free of charge and people are able to talk in the strictest confidence.

Furthermore, all FDJ buyers' variable remuneration components are indexed to responsible purchasing objectives (hitting supplier CSR performance targets, using sheltered employment channels, etc.), so as to guarantee and encourage them to promote responsible sales and partnership practices with suppliers.

7.6.2 SHORTENING PAYMENT TIMES

In order to optimise its economic performance, FDJ is targeting a "zero payment default" rate by 2025 on supplier invoicing to protect the financial viability of its suppliers. With this in mind, the Group has taken action in a number of areas to improve payment times, through the:

- continued enrolment of suppliers in the Tradeshift invoice automation system;
- optimisation of expense approval thresholds.

FDJ has also introduced a discount platform to facilitate the early payment of supplier invoices, in conjunction with C2FO, world leader in working capital optimisation solutions. Through this platform, suppliers can now request the early settlement of one or more outstanding invoices in return for a discount. FDJ will settle the invoice(s) on the requested date, less this discount.

The average payment time for FDJ suppliers was 38 days at the end of 2022 (shorter than the required statutory 60-day period, barring exceptions), compared with 37 days in 2021.

7.6.3 LOCAL AND INCLUSIVE PROCUREMENT

In keeping with the Group's CSR values, the social and societal aspects of the responsible purchasing policy place a strong emphasis on sourcing through French channels.

In 2022, FDJ Group's French subsidiaries⁽³⁾ contributed to the economic, social and societal vitality of regions throughout the country, making nearly 90% of their purchases (in value) in France and 85% with small and medium-sized enterprises (SMEs) and intermediate-sized enterprises (ISEs) (see section 10 Territories).

FDJ Group is also committed to supporting inclusive procurement. It is keen to continue to increase purchases from disability-inclusive businesses by 2025. In 2022, more than €1.3 million worth of purchases were invoiced by ESATs (vocational rehabilitation centres) and EAs (disability-inclusive companies), compared with €924 thousand in 2021, and around 7% of FDJ's suppliers were located in priority urban policy districts ("QPV").

(1) <https://www.groupefdj.com/en/commitments/sustainable-purchasing.html>.

(2) Global Ecovadis basis: 44/100.

(3) FDJ SA, FGS France, FDP, FDI, FDJ Services and DVRT 13.

7.6.4 IMPROVING SUPPLIERS' ENVIRONMENTAL PRACTICES

FDJ Group is taking action to shrink the carbon footprint of its purchases by getting suppliers to reduce their greenhouse gas emissions in accordance with the Science Based Targets initiative (see section 11 Environment).

With Ecovadis, FDJ also assesses suppliers' environmental performance based on nine environmental criteria: energy consumption and greenhouse gas emissions, water, biodiversity, local and accidental pollution, raw materials, chemicals and waste, product use, end-of-life products, protection and promotion of consumer health and safety, and environmental services. On average, the suppliers that Ecovadis assessed in 2022 scored 68/100 in the environmental category.

PERFORMANCE INDICATOR: SHARE OF STRATEGICALLY-IMPORTANT AND MAJOR SUPPLIERS ASSESSED BASED ON CSR PERFORMANCE

	2021		2022	
	Number	Share	Number	Share
FDJ	123	68%	116	74%

In 2022, CSR performance was assessed for 116 of the 160 suppliers that were considered to be strategically-important and major.

PERFORMANCE INDICATOR: AVERAGE PAYMENT TIMES

	2021	2022
FDJ	37 days	38 days

FDJ extended the average payment time for suppliers by 1 day between 2021 and 2022.

PERFORMANCE INDICATOR: SHARE OF INVOICES SETTLED LATE

	2021	2022
FDJ	2.8%	2.2%

By 2025, FDJ aims to achieve a "zero payment default" rate on supplier invoicing to protect the financial viability of its suppliers. In 2022, 2.2% of invoices were paid late.

PERFORMANCE INDICATOR: AMOUNT OF GROUP PURCHASES FROM ESATS AND EAS

in thousands of euros	2021	2022
FDJ	811	1,204
FDJ Group	924	1,306

The amount of purchases from disability-inclusive businesses rose in 2022, thanks in particular to a series of actions relating to IT services purchases.

7.6.5 OUTLOOK

As part of its environmental policy, FDJ will be introducing a tool in 2023 to gather data, assess and steer the Group's carbon review (see section 11.1 Combating climate change).

8. Human resources

FDJ Group is keenly aware that employee engagement is an essential factor in achieving sustainable performance. With this in mind, it is working to develop and implement an ambitious, innovative and inclusive Human Resources policy.

The Group wants to make its employees the beating heart of its actions, while still taking stakeholders' expectations into consideration, with, in particular, extensive integration of demands relating to diversity, equal opportunities and efforts to combat all forms of discrimination.

PROFILE OF HUMAN RESOURCES AT THE GROUP

RESULT: NUMBER OF PERMANENT AND FIXED-TERM EMPLOYEES AT 31 DECEMBER ⁽¹⁾

Entity	Country	2021			2022		
		Permanent	Fixed-term	Total	Permanent	Fixed-term	Total
FDJ	France	1,531	72	1,603	1,665	71	1,736
FDP	France	452	15	467	471	21	492
FDI	France	28	0	28	28	0	28
PDJ	French Polynesia	17	3	20	19	0	19
FGS France	France	102	3	105	112	5	117
FGS Canada	Canada	2	-	2	1	0	1
FDJD	France	16	1	17	15	3	18
FGS UK ⁽¹⁾	United Kingdom	36	-	36	0	0	0
Sporting Group	United Kingdom	246	3	249	272	2	274
FDJ Services	France	9	-	9	14	0	14
FDJ GROUP		2,439	97	2,536	2,597	102	2,699

(1) The FGS UK workforce was transferred to Sporting Group in 2022.

As at 31 December 2022, the Group employed 2,699 people at the companies within its scope of consolidation. FDJ, with 1,736 employees, represented almost 64.3% of the Group headcount, while the commercial subsidiary FDP employed 492 people, representing 18.2% of the total Group headcount. The 6% increase in the Group workforce in 2022 was fuelled by FDJ (with growth of 8.3%).

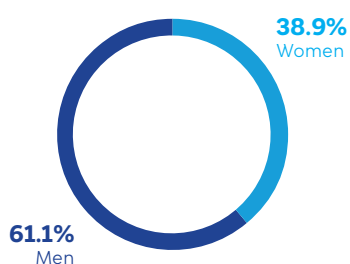
(1) The headcount presented in the table takes into account permanent and fixed-term employment agreements only, whilst the information provided in the financial statements includes all types of employment agreements, including interim and intermittent contracts.

RESULT: PROFILE OF THE WORKFORCE AT 31 DECEMBER

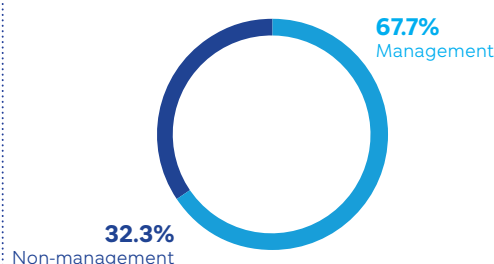
	2021		2022	
	Management	Non-management	Management	Non-management
FDJ	1,391	212	1,527	209
FDJ Group	1,664	872	1,828	871

In 2022, management-level employees accounted for 67.7% of the Group's total workforce, compared to 65.6% in 2021.

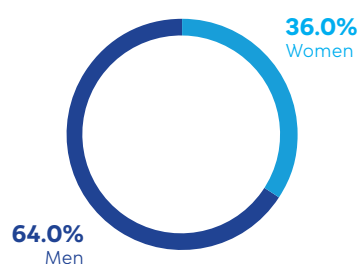
WORKFORCE DISTRIBUTION BY GENDER



WORKFORCE DISTRIBUTION BY GRADE

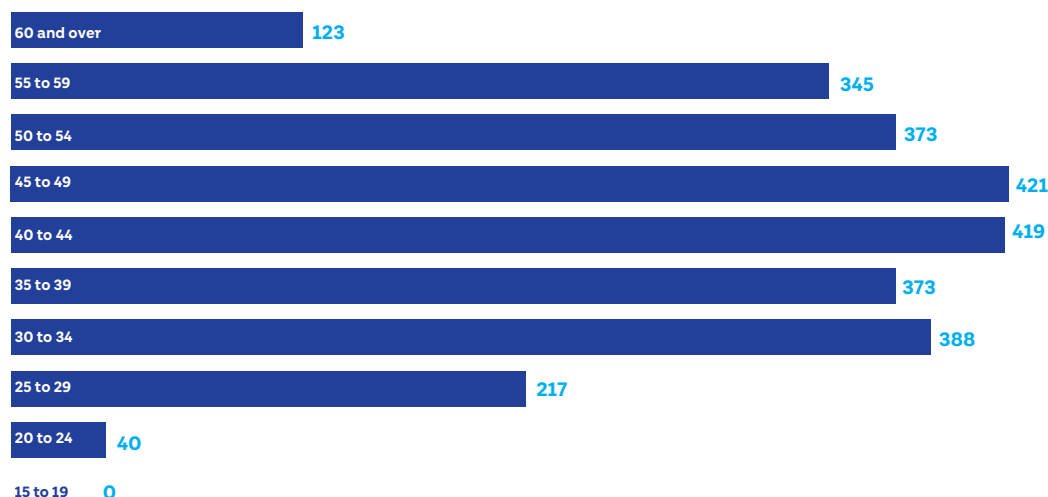


DISTRIBUTION OF MANAGERS BY GENDER



AGE PYRAMID AT 31 DECEMBER

	60 and over	55 to 59	50 to 54	45 to 49	40 to 44	35 to 39	30 to 34	25 to 29	20 to 24	15 to 19	Average age
FDJ	91	191	229	271	280	249	280	139	6	0	42.8
FDJ Group	123	345	373	421	419	373	388	217	40	0	43



In 2017, the Group decided to start making a distinction between "seniors", who are actively preparing for retirement, and "jeniors" aged 45 and over, in order to capitalise on their experience and commitment. Work was undertaken with these employees following an in-house

analysis in conjunction with Harris Interactive. As a result of this work, new training programmes for "jeniors" were incorporated into the training catalogue, together with the "Point 50" programme for employees in their fifties and the "Cap 60" programme for future retirees.

RESULT: AVERAGE EMPLOYEE SENIORITY

	2021	2022
FDJ	11.3 years	10.90 years
FDJ Group	11.1 years	10.85 years

The manner in which seniority at the Group evolves is connected to the recruitment dynamic.

RESULT: GENDER DISTRIBUTION IN THE WORKFORCE

	2021				2022			
	Men	%	Women	%	Men	%	Women	%
FDJ	920	57.4%	683	42.6%	1,012	58.3%	724	41.7%
FDJ Group	1,548	61.0%	988	39.0%	1,649	61.1%	1,050	38.9%

8.1 ENSURING SOUND MANAGEMENT OF EMPLOYEE SKILLS

In a competitive environment, characterised by profound changes, it is essential that the Group has committed teams and the best possible expertise in order to develop its operations. With this in mind, the employment and career management policy that FDJ has been developing for more than ten years is designed to prepare for the evolving tasks that will be entrusted to employees and the skills they will need to acquire, and to optimise the manner in which they are guided along their career paths and develop their talents.

Each year, the Group devotes a substantial part of its budget to training. A total of €2.1 million was set aside during the year, representing 3.77% of payroll expense. The Group made a point of maintaining and developing the employability (hard skills and soft skills) of all employees in 2022, by hosting training sessions that suit the needs of each individual. This meant that 96% of employees were able to complete at least one course. On average, each employee completed 15 hours of training in 2022.

Training requirements cover four main areas:

- hard skills directly relating to operational tasks and the fast-paced changes in these areas, particularly in IT, cybersecurity, data, digital technologies and sales and marketing. For instance, in 2022, a particular focus was placed on coordinating commercial performance across the entire sales force, as well as on new customer acquisition;
- soft skills (e.g., knowing how to pitch an idea, to speak in public, etc.), which are just as important to individual and collective performance as hard skills;
- supporting managerial practices in keeping with the Group's managerial model, with three key angles: managers who are coaches, managers who are leaders and performance managers. With this in mind, a programme was rolled out to help new FDJ Group managers take on their managerial role, together with a new support programme for managers' superiors.

Additionally, executive officers also completed a programme on "Managing complex situations and uncertainty";

- proficiency in foreign languages for business (especially English), in keeping with the Group's international expansion and the integration of subsidiaries in English-speaking markets, through courses tailored to everyone (online training platform, individual sessions or courses in groups on specific industry themes).

In order to take into account individual situations and target its actions, the skills development plan combines several approaches:

- individual mobility plan in the event of a change in role and/or assignment;
- training courses to help employees build their career plan, and a specific programme designed for employees in their fifties to help them stay motivated and have an active say in how their career evolves until retirement;
- specific development programmes for women returning to work after maternity leave.

Each course is first reviewed by the manager and the training department to ensure that it ticks all the boxes in terms of what the employee is hoping to get out of it and the needs of the Group.

8.1.1 OUTLOOK

The Group will work on strategic issues such as data upskilling and changes in the CSR training plan, while addressing environmental issues in a more targeted manner and supporting the Company's international expansion.

The data upskilling plan will be carried out on two levels:

- online courses so that all staff can become acquainted with issues relating to data and artificial intelligence;
- specific modules to develop business line expertise, geared towards employees with data-related duties.

As for the consideration of CSR issues, the Group will further enhance its managerial model by rounding out the "socially-responsible manager" dimension. With respect to the environment, upskilling support will be provided to managers to help them fully understand the issues at stake and to properly integrate these issues into the way they go about and manage their duties. This approach will be supplemented by specific business line training (e.g., Purchasing, Marketing/Communication, etc.) to truly turn skills and knowledge into operational actions that will improve the Group's environmental performance.

FDJ will also continue to support managerial performance by placing a strong emphasis on handling complex situations and uncertainty and handling change, so that management can adapt and guide staff through changes at the Group.

2023 will also mark a fresh milestone in the transformation of the Group's sales model, with a training programme to create new, more personal, management roles and the creation of the first "wider sales sectors". As part of this, "core" training (sales function) programmes will be introduced to enable everyone to master the skills needed to achieve the Company's goals (e.g., steering commercial performance, new customer acquisition, etc.). These programmes will be jointly designed by Human Resources and the business lines in order to factor in the situation on the ground.

Lastly, the Group will continue to promote the use of business English to accompany its international expansion strategy.

PERFORMANCE INDICATOR: NUMBER OF TRAINING HOURS

	2021	2022
FDJ	26,792	30,821
FDJ Group	39,417	40,403

In 2022, the increase in the number of training hours at FDJ Group (+2.50%) was due to a rise in the budget assigned to training.

PERFORMANCE INDICATOR: PERCENTAGE OF PAYROLL EXPENDITURE DEVOTED TO TRAINING

	2021	2022
FDJ	3.80%	4.12%
FDJ Group	3.35%	3.77%

The share of payroll expenditure set aside for training rose at the Group in 2022 (by +0.5 of a point).

PERFORMANCE INDICATOR: PERCENTAGE OF EMPLOYEES WHO COMPLETED TRAINING DURING THE YEAR

	2021	2022
FDJ	96.1%	91.4%
FDJ Group	97.5%	96%

This calculation includes employees who left the Company during the year, but had completed training beforehand.

8.2 PROMOTING A CONSTRUCTIVE SOCIAL DIALOGUE

FDJ has been working for many years to develop and maintain a high standard of social dialogue. This is a critical part of the Company's sustainable performance policy. FDJ adheres to and enforces the principles and fundamental rights of the International Labour Organization at all of its entities, particularly the freedom of association and the effective recognition of the right to collective bargaining.

Social dialogue is organised with employee representation bodies Group-wide and also at the level of the various legal and geographical entities.

Each Group entity has its own employee representation in keeping with the statutory requirements, i.e. based on the number of people it employs. Entities that employ:

- at least 50 people have a "key responsibility" social and economic committee (or "CSE" - as is the case at FDP or FGS France for example), or entity-level CSE and Central CSE (FDJ SA);
- between 11 and 49 people have a "non-advisory" CSE (e.g. FDI).

Accordingly, the main employee representation bodies within the Group's entities are as follows:

- a Group Committee that brings together employee representatives from FDJ, FDP and FGS France. This committee represents all of the Group's entities and meets three times a year;

- within FDJ SA:
 - at a central level: a Central Social and Economic Committee (CSEC) and an Occupational Health and Safety Commission (CSSCT), together with the statutory and conventional commissions (e.g. economic commission, gender equality commission, etc.);
 - at the level of each entity: an entity-level CSE and an Occupational Health and Safety Commission (CSSCT), together with other commissions;
- at FDP: a Social and Economic Committee (CSE) and an Occupational Health and Safety Commission (CSSCT), in addition to the statutory and conventional commissions;
- at FGS France, La Française d'Images and FDJ Développement: a Social and Economic Committee (CSE).

All projects with a bearing on the general running of the Company are regularly presented to and discussed by these bodies. For instance, in 2022, they served as a forum to regularly discuss plans for a series of organisational changes. The high standard of social dialogue at FDJ Group is such that employee representation bodies are systematically consulted when reorganisation plans are on the table, using the following methodology:

- a meeting is held to present/discuss the general principles of the reorganisation;

- a meeting is held to present/discuss the main tasks envisaged for the entities; and
- a meeting is held to present a detailed description of the organisation along with the associated change management plan (communication plan, training plan, kick-off seminar, etc.).

Thanks to this methodology, which is shared with the labour relations partners, it is possible to gather all the advisory opinions of the Group's employee representation bodies on the projects submitted. Similarly, strategy and strategic directions are regularly presented and discussed at FDJ CSEC meetings.

Management has been preparing a Group-wide employee framework for a number of years with the following focuses:

- employee savings;
- top-up health insurance and personal protection plans;
- the employment and career management policy;
- gender equality, gender diversity and social and cultural diversity.

Over the medium term, the aim is to work with the unions representing employee interests at Group level to harmonise the various measures, practices and agreements.

Like in 2021, the number of agreements increased in 2022, with four new agreements being signed on pre-retirement leave, the collective retirement savings plan, time savings accounts ("comptes épargne temps" - CET) and leave-sharing, and on the release of amounts paid into the special profit-sharing and incentive fund under the French "Purchasing Power Act" in respect of employee share ownership.

At the end of 2022, Group-wide talks led to the signature of two agreements regarding top-up health insurance and personal protection plans, with a view to harmonising the system for all Group entities. Talks also got under way on the employment and career management policy, and will likely continue in 2023.

Negotiations are regularly organised at Group companies that have union representation (FDJ, FDP, FGS France, FDJ Développement and La Française d'Images). At FDJ, management meets with representative trade union organisations twice a month to negotiate agreements, which helps to guarantee a high standard of social dialogue.

In 2022, these meetings led to the signature of four agreements or amendments at FDJ: the wage agreement in which the wage policy was set for 2022, the incentive agreement for 2022 and the amendment to the 2019 remote working agreement, introducing less restrictive remote working rules for staff.

The planned topics on the agenda for 2023 at FDJ include: wage talks and the setting of criteria for the 2023 incentive plan, together with Group-wide talks on the employment and career management policy.

2023 wage talks began earlier than usual in response to the exceptional inflation environment observed in 2022. After informing and consulting with the employee representation bodies at each Group entity in December 2022, the decision was made to grant a value sharing bonus ("prime de partage de la valeur" - PPV) to employees who are on wages of up to 2.7 times the French minimum wage, pursuant to Article 1 of the law introducing emergency measures to protect purchasing power. This bonus was paid in two equal instalments in December 2022 and January 2023. Wage talks then continued from January 2023 onwards.

OVERVIEW OF THE AGREEMENTS SIGNED DURING THE YEAR

Scope	Theme	Brief description	Signature
Group	Pre-retirement leave	Enable employees to take leave of up to three years prior to their official retirement date under an attractive compensation package. This also facilitates the transfer of knowledge and skills.	26.04.2022
Group	Collective retirement savings plan (PERCOL)	Introduction of a collective retirement savings plan. This agreement harmonises the existing retirement savings measures at each Group entity and provides for the introduction of new ones. It also gives each employee an opportunity to set aside retirement savings that will be eligible for lower tax rates and lower social security contribution rates.	25.07.2022
Group	Time savings accounts (CET) and leave-sharing	First ever Group-wide agreement on time savings accounts and leave-sharing, replacing the company agreements on these issues. This agreement harmonises procedures and makes it possible to: <ul style="list-style-type: none"> - accumulate rights to paid leave in consideration for periods of leave not taken or rest days worked; - build up savings in preparation for retirement; - develop a system of mutual aid by enabling staff to transfer their days off to other employees. 	11.08.2022
Group	Exceptional release of €10,000	The Group signed an agreement to allow employees to release assets invested in the form of Company shares, within the framework of the French law of 16 August 2022, which introduced emergency measures to protect consumer purchasing power, whereby the holders of a company savings plan will be exceptionally permitted to release up to €10,000 in respect of profit-sharing and/or incentive bonuses paid into these plans.	23.09.2022



Scope	Theme	Brief description	Signature
Group	Healthcare costs	The Company issued a request for proposals over the summer as part of a review of the top-up health insurance (healthcare costs) and personal protection plans, with a view to: <ul style="list-style-type: none"> – harmonising the cover provided to Group employees (management staff relative to non-management staff, FDJ SA relative to subsidiaries); – optimising the cover provided to Group employees with respect to the basic and optional premiums paid into the plans; – optimising the services provided by the administrator and the insurers: quality of service, digitalisation, etc. – optimising the fees paid to the administrator (cost commensurate with the service provided); – alongside this, talks with the trade union representatives led to the signature of an agreement. 	07.12.2022
Group	Personal protection plans		07.12.2022
FDJ	Wage agreement	2022 wage policy agreement	25.02.2022
FDJ	Remote working	<ul style="list-style-type: none"> – Amendment to the 2019 remote working agreement, introducing less restrictive remote working rules; – Remote working possibilities for all employees (except those whose duties absolutely cannot be performed remotely) who have been on the payroll for at least 3 months; – Capped at 100 days of remote working per year, based on a pre-determined or flexible schedule; – €2.50 compensation paid for every day worked remotely; – On-site presence of at least 2 days/week; – Option to work remotely from a place other than one's primary residence (second home/family home). 	25.02.2022
FDJ	Incentive plan	2022 agreement setting the incentive plan criteria	28.03.2022
FDJ	Support measures for staff at the Villepinte site	Agreement containing measures to help staff move nearer to the Delta site or to compensate them for their longer commute.	07.12.2022

PERFORMANCE INDICATOR: NUMBER OF LABOUR AGREEMENTS SIGNED DURING THE YEAR

	2021	2022
FDJ	3	4
FDJ Group ⁽¹⁾	5	6

(1) Scope covered: entities incorporated in France.

8.3 STRENGTHENING DIVERSITY, INCLUSION AND GENDER EQUALITY IN THE WORKPLACE

The Group has been working for many years to combat discrimination and promote inclusion and equal opportunities. This commitment reflects a firm belief that diversity and social cohesion are invaluable attributes that build employee engagement and drive sustainable performance. FDJ has been pursuing an ambitious four-pronged "Diversity and Inclusion policy" since 2010: gender equality in the workplace, inclusion of persons with disabilities, intergenerational work and inclusion of people from diverse social backgrounds. Two additional focuses were introduced in 2021, i.e. sexual orientation and gender identity.

The Diversity and Inclusion policy and associated initiatives are presented each year to the Group Management

Committee, the CSR and RG Committee and the Board of Directors.

A labour agreement on these issues was signed in 2021 thanks to the close collaboration of management and the Group employee representation bodies. The purpose of this agreement is ultimately to introduce a common social framework for all Group employees (see section 8.2 Promoting a constructive social dialogue).

FDJ Group conducted its first-ever Diversity and Inclusion survey⁽¹⁾ in 2022 with a view to assessing the level of diversity among its staff, gauging the degree to which staff felt included or discriminated against, and ascertaining what they expect from the Group's Diversity Policy. The 40% response rate⁽²⁾ for this first survey provided a wealth of

(1) Scope covered: only the Group's French entities.

(2) Rate calculated based on the number of people employed by the Group when the survey was conducted.

valuable information to adjust the existing diversity and inclusion action plans.

As part of a continual effort to improve, the Group enhanced the manner in which diversity and gender equality are managed, based on compliance with the AFNOR Certification specification document. As a result, FDJ was once again the proud recipient in 2021 of the ALLIANCE label, combining the Gender Equality and Diversity labels. FDJ also continued its work to control diversity and inclusion risks by formally introducing specific risk analysis (incorporating, for example, respect for human rights in terms of discrimination, ethics and quality of life at work). The plan is to take these risks into account in the Group's risk-mapping exercise.

Training and awareness initiatives focused on diversity and inclusion

Employee training and awareness are fundamental aspects of any inclusion policy. FDJ Group has developed different programmes with this in mind:

- for the management team: the members of the Group Management Committee attended a Diversity and Inclusion awareness session in December 2021;
- for the managers:
 - systematic training has been introduced on the theme of "Labour laws and managing". This is an integral part of mandatory training for managers. It defines what discrimination is and explains how to follow best recruitment practices with no unfair biases,
 - since September 2021, a guide on "Fair hiring practices" has been provided to human resources staff and managers with recruitment powers to help them conduct unbiased interviews;
- for all staff:
 - CSR training has been introduced with a comprehensive section on discrimination,
 - a Diversity challenge was organised in September 2022. Staff were given access to 10 e-learning training modules for one month to learn about what they can do to tackle discrimination and harassment, and to find out more about the key focuses of the Group's inclusion policies,
 - in 2022, a three-year training plan centred on enhancing diversity, tackling all forms of discrimination and combating harassment was launched with people who can make a very real difference in this area (recruiters, managers, buyers, employee representatives, etc.). We are currently developing a specific e-learning training module in partnership with Mozaik RH,
 - in October 2022, the staff at our various sites received a copy of a Diversity and Inclusion comic book. This book was also provided to the participants in a live interactive conference held in conjunction with the Responsible Purchasing team, which focused on the Group's engagement when it comes to inclusion.

All this information is readily available to employees in the diversity section of the FDJ Intranet portal (with contact information for various helplines and support services). They also have access to a wide range of material, including a humorous and instructive web series (in 12 episodes that communicate the key messages), and replays of conferences/webinars available to all, rounding out the Group's diversity and inclusion awareness measures.

8.3.1 GENDER EQUALITY IN THE WORKPLACE

FDJ Group is particularly committed to gender equality in the workplace, an issue that is supported at the highest level of the Company, through a large number of training and awareness initiatives.

In-house awareness initiatives

Each year, the Group stages an event on 8 March to coincide with International Women's Day. Since 2015, booklets are handed out to all members of staff to raise awareness about the importance of gender equality.

Measures for parents

FDJ has had specific measures in place for many years to help staff who are expecting a child or who are parents already. The Group believes that becoming a parent is a crucial event in a person's life. Fathers who avail of the statutory 28-day paternity leave are entitled to receive their full pay⁽¹⁾. FDJ Group employees can also take a leave of absence of up to six months, during which they will be entitled to receive between 50% and 75% of their gross monthly salary, depending on what system they choose, a measure that is also available for parents who have used a surrogate to have a child. There are also support services (training, coaching, etc.) in place to help all employees returning to work after maternity/parental leave. Furthermore, FDJ Group is particularly attentive to how women's pay evolves when they return from maternity leave. Parents are also entitled to four days off to care for a sick child and can avail of a system to apply for a place in a nursery.

The Group has prepared a guide in which it explains the legal provisions for parents and the measures it has introduced for every parent, be they a (future) mother, a (future) father or a second parent, as stipulated in the related agreement.

Female representation on governing bodies and equal pay

FDJ has been included, for the second year in a row, in the top ranks of SBF 120-listed companies⁽²⁾ in terms of female representation on its governance bodies, taking 7th place and registering the highest score based on the workplace gender equality index. This recognises FDJ's long commitment to gender equality in the workplace and its proactive gender diversity policy.

(1) Pursuant to the French paternity law, which came into effect on 1 July 2021.

(2) Assessment of female representation on a company's governance bodies and in all echelons of the organisation (based on the Workplace Gender Equality index). The press release is available (in French) at: <https://www.groupefdj.com/fr/journalistes/le-groupe-fdj-recompense-par-la-4e-place-au-palmiers-de-la-feminisation-des-entreprises-du-sbf-120.html>.



In 2022, and for the third year, Option Finance & Humpact held the Humpact Awards in association with VENDOME ASSOCIES to reward the most sustainable listed companies. FDJ was nominated in the Gender Equality category.

Moreover, further to the decisions taken by the Board of Directors at its 16 December 2020 meeting, and in accordance with the provisions of Article 7.1 of the AFEP-MEDEF code, the Company is taking steps to ensure that the proportion of women in the Group of Executive Managers (GEM) is equivalent to the proportion of women in the total Group workforce by 2023.

PERFORMANCE INDICATORS: PROPORTION OF WOMEN IN THE TOTAL GROUP WORKFORCE AND IN THE GROUP OF EXECUTIVE MANAGERS

	2021	2022
Proportion of women in the total Group workforce	39.0%	38.9%
Proportion of women among the GEM	33.8%	35.1%

The percentage of women in the GEM has risen by 1.3 points since this Board decision was made, going from 33.8% on 31 December 2021 to 35.1% on 31 December 2022.

PERFORMANCE INDICATORS: PROPORTION OF WOMEN IN THE TOTAL GROUP WORKFORCE AND PROPORTION OF WOMEN MANAGERS

	2021		2022	
	Proportion of women	Proportion of women managers	Proportion of women	Proportion of women managers
FDJ	42.6%	41.8%	41.7%	40.9%
FDJ Group	39.0%	34.3%	38.9%	36.0%

RESULT: WORKPLACE GENDER EQUALITY INDEX ("PÉNICAUD" INDEX)

	2021	2022
FDJ	100/100	100/100
FDP	92/100	98/100
FGS France	84/100	84/100

RATE OF PROMOTION AMONG EMPLOYEES WITH PERMANENT CONTRACTS (CHANGE OF GRADE)

	2021			2022		
	Women	Men	Combined	Women	Men	Combined
FDJ	13.2%	10.6%	11.7%	10.9%	8.7%	9.6%

FDJ is pursuing specific actions to equally distribute promotions among men and women.

Tackling stereotypes

FDJ Group put its name to the "StOpE au Sexisme" charter in December 2020 to combat everyday acts of sexism, in addition to the SISTA charter, which it signed in October 2020, to promote gender diversity in digital industries and enable more women entrepreneurs to secure financing from investment funds for their start-ups. In 2022, every member of the Group Management Committee put their names to a Company charter drawn up in conjunction with the "Jamais sans Elles" association. By signing this charter, they have personally committed to never again attend a public event or a media event, in person or remotely, where there is no gender diversity (at least one of the participants must be a woman).

More than 130 employees (men and women) have joined the in-house All'In network formed in 2016 to promote gender

diversity. They work to demonstrate that equality cannot become a reality without the help of men and women alike, to do away with the preconceived ideas that lead to inequality and truly create equal opportunities. All'In draws its inspiration from and shares best practices with gender diversity networks set up at other large groups, as part of an organisation called "Mixité en Seine".

Lastly, a gender equality commission has been set up with representatives of the management team, the trade unions and the All'In network and a representative of the Diversity team, to monitor progress with the commitments made as part of the Group agreement on Diversity, Gender Equality and QWL⁽¹⁾. The commission's first meeting was held in December 2022 to present the progress made during the year in figures and to discuss areas for improvement and the action plan to be set in motion for the coming year.

(1) This agreement is available on the corporate website at: www.groupefdj.com.

8.3.2 INTEGRATING PERSONS WITH DISABILITIES

For nearly 15 years, FDJ has been striving to integrate persons with disabilities into the workforce. This has led it to embark on a large number of recruitment, support and awareness initiatives.

Recruitment and support

When it comes to support, the Group has been working year after year to improve the measures in place to support employees with a disability. In-depth surveys were carried out in 2022 among all employees with RQTH status⁽¹⁾, and the results of these surveys were used to improve the support provided, where such improvements were needed. Similarly, individual coaching sessions and a string of training/awareness sessions were held in conjunction with our partner UNIRH for the teams tasked with integrating employees with a disability.

As part of a continued commitment to recruit people with disabilities, FDJ set a target for 2022 to keep the proportion of disabled employees above 5.34% in the criteria set for the Company's incentive plan, as part of a conscious effort to get all employees behind this issue, by:

- getting involved in specialised job fairs/forums⁽²⁾;
- identifying, with the help of selected partners, a pool of talents who meet diversity criteria, including those relating to a disability, in order to work towards attaining the Group's goal of having people with a disability make up more than 6% of the workforce;
- allocating a special budget to hire young work-study applicants with RQTH status;
- working with new specialised recruitment agencies to identify applicants for high-level positions, and further developing partnerships with EAs (disability-inclusive companies) and ESATs (vocational rehabilitation centres)⁽³⁾.

In-house awareness initiatives

Alongside this recruitment plan, awareness initiatives have been set in motion with Group employees, notably through Duoday⁽⁴⁾, workshops on invisible disabilities (psychological disabilities), and a series created in conjunction with actors and neuroscience specialists.

Tackling stereotypes

As part of an effort to improve and draw on best practices already tried and tested at other organisations, and to interact with various diversity stakeholders, the Group participates in the actions led by the association Hangagés, which FDJ founded in 2009, and which specialises in disability issues in corporate environments and in the integration of people with a disability.

PERFORMANCE INDICATOR: RATE OF DIRECT EMPLOYMENT OF PERSONS WITH DISABILITIES

	2021	2022
FDJ	5.22%	5.36%
FDJ Group	5.21%	5.61%

The data provided for FDJ Group does not include FDJ Gaming Solutions UK, Sporting Group, both incorporated in the United Kingdom, or Pacifique des Jeux. The increase in the Group rate was driven by a rise in the rates reported for all contributing entities (with a sharp increase for the commercial subsidiary FDP). The increase in the rate shown for FDJ was tied to a sharp rise in the number of employees with RQTH status and came despite the increase in the overall workforce (linked to new hires).

8.3.3 INTERGENERATIONAL INITIATIVES

FDJ has supported the employment and training of young people for many years. It has also been actively exploring courses of action for senior profiles.

Employment of young people

FDJ Group has been pursuing a dynamic recruitment policy since 2018, hiring almost 1,000 people, with nearly a quarter of them aged under 26. It has been stepping up its recruitment and training drive since 2021 for interns and work-study participants from all types of backgrounds. There were 130 young people on work-study contracts in 2022.

FDJ attaches great importance to providing trainees with an experience of the highest standard, namely through:

- one-on-one supervision by a mentor who has been specifically trained for this purpose;
- the chance for trainees to follow the same integration path as any Group employee;
- the opportunity to meet with their Human Resources liaison officer.

Choose My Company⁽⁵⁾ has awarded FDJ the "Happy Trainees" label for the fifth year in a row, based on reviews submitted by the Group's work-study participants and interns. With a score of 4.4/5, this label is the result of the integration and daily support provided to work-study students and interns as well as their tutors.

(1) "Reconnaissance de la qualité de travailleur handicapé" (recognition of disabled worker status).

(2) Paris Pour l'Emploi, Talent Handicap and Hello Handicap.

(3) See section 7.6 Promoting responsible purchasing.

(4) An event staged to change people's perceptions of disabilities (and providing a good talent pool).

(5) Choose My Company, founded in 2011 by human resources, IT and digital specialists, helps develop organisations' performance and appeal by surveying employees, interns, applicants and customers.

PERFORMANCE INDICATOR: NUMBER AND PERCENTAGE OF WORK-STUDY PARTICIPANTS

	2021		2022	
	Number of work-study participants	Percentage of work-study participants	Number of work-study participants	Percentage of work-study participants
FDJ	130	7.5%	104	6%
FDJ Group	169	6.2%	130	4.8%

“Jeniors” and seniors

“Junior” employees (aged 45 and up) and senior employees (those in the process of actively preparing for retirement) accounted for 47% of the FDJ Group workforce in 2022. They make a significant contribution to the collective Group dynamic.

In addition to all the other training provided, these employees can also avail of specific programmes to prepare for retirement: the “Point 50” programme enables employees in their fifties to take stock of their career, expectations and needs, and takes a look at intergenerational work opportunities and existing retirement arrangements; while the “Cap 60” programme is geared towards employees in their sixties and covers practical issues as they prepare for retirement.

The engagement rate among seniors ⁽¹⁾ stands at 92%, which is slightly higher than for the overall workforce (see section 8.5 Ensuring employee engagement).

8.3.4 DIVERSITY OF ORIGINS AND SOCIAL DIVERSITY

FDJ signed up to the PAQTE (neighbourhood pact for all businesses) initiative in 2018. PAQTE is built on four pillars:

- awareness-building via a policy of developing internships within the Company, especially for students in their last year of lower secondary school, under the government-sponsored system for schools located in REP+⁽²⁾ areas;
- training, with the development of access to apprenticeships for students from priority urban policy districts, in terms of career orientation, access to combined work-study programmes and support for apprentices;
- recruitment to support employment in priority urban policy districts and guarantee discrimination-free hiring methods;

- purchasing, with a view to developing responsible and inclusive procurement from businesses operating in socially disadvantaged areas. In 2022, around 7% of FDJ's suppliers were located in priority urban policy districts.

FDJ took part in the second annual economic inclusion summit organised by Mozaïk RH to discuss, draw on and share best economic inclusion practices, and to participate in a job-dating exercise to promote the employment of people from diverse social backgrounds.

8.3.5 GENDER IDENTITY AND ORIENTATION

FDJ wants each and every employee to feel accepted within the Group, regardless of their gender identity or orientation. Should they wish to, every person must feel that they can talk freely about their partner and their family life.

With this in mind, FDJ Group teamed up with the people at TETU.CONNECT in 2022 to draw on their experience and gain insight from people throughout the world of work. The Group was able to build on this partnership to organise a first awareness conference to discuss how to combat discrimination against LGBTQIA+ people, attended by Ouissem Belgacem (a former professional international footballer who came out) and an expert from TETU.CONNECT.

This live interactive conference, which all Group staff could watch, was also an opportunity to show the Group's commitment to inclusion issues and to announce the launch of work to comply with the provisions of the LGBT+ Charter drawn up by the association L'Autre Cercle, with a view to signing it in 2023.

FDJ Group also covered this theme in the diversity and inclusion comic book handed out to staff at sites in all our French-speaking markets in 2022.

(1) The measurement of the engagement rate among seniors is based on the findings of a survey conducted among employees aged between 51 and 60.

(2) “Réseau d'Éducation Prioritaire” (priority education network).

8.4 DEVELOPING QUALITY OF WORK LIFE

FDJ has been taking proactive measures for many years to promote quality of work life and well-being in the workplace. As part of this, the Group conducts an annual in-house survey (see section 8.5 Ensuring employee engagement) to regularly monitor and ensure employee well-being and to identify employees' needs.

RESULT: AVERAGE WELL-BEING AT WORK SCORE GIVEN BY EMPLOYEES

	2021	2022
FDJ Group	85/100	79/100

The fall in the score was due to a change in the way the question was formulated.

Keen to keep this score high, FDJ takes action throughout the year to ensure quality of work life (QWL) and occupational health and safety (OHS), two essential components of a fulfilling and engaging work life for each individual, and key to collective performance.

Quality of work life

Suitable work conditions, ways of doing things that are adapted to business lines and specific profiles, and feedback mechanisms with the provision of various channels to escalate information, all play a part in employee well-being.

Actions geared towards employees

FDJ Group has been raising awareness about QWL for many years throughout its workforce:

- various events were held to coincide with 2022 QWL Week, with sophrology sessions, stress management workshops, experiential workshops on "Understanding and reacting to early warning signs of burn-out", escape games and "Quality of Work Life" surveys, a conference on "How to get rid of Musculoskeletal Disorders", seated massage sessions (an initiative particularly geared towards staff at logistics warehouses, which will become a permanent fixture);
- two interactive conferences hosted by our partner April4Me were held for our employees this year to help them recognise signs of burn-out and psychological risks and provide them with information on the various support systems in place at the Group;
- a personalised holistic support programme has also been introduced. In 2022, two three-month courses were run in which participants were able to complete a programme to help them assess their "get up and go" (recognising signs of fatigue, weak signals of stress, etc.), recover a physical, emotional and mental balance and better manage their time and priorities in order to strike a healthier work/life balance;

- lastly, a pilot test was carried out with the staff of the Employee Experience and Transformation department in the form of a webinar to help them draw on their inner resources and to discover (or recover) their energy and vitality.

Alert systems for employees

Maintaining quality of work life has been paramount for the Group since the public health crisis first began, in order to address the sense of unease, anxiety and isolation that such a situation can bring. Alongside the measures taken by HR and management, who play a crucial role in the quality of work life, other specific measures were introduced to reassure and support employees.

FDJ Group invites its employees to escalate any cases that may point to unease, a need for assistance with personal or work-related issues, or any suspicions of harassment or discrimination. As part of the measures taken to improve access to support services, the Group has:

- adapted the manner in which its in-house support units operate, by pooling the tools at hand (pooled whistle-blowing system, facilitating the escalation of situations that are contrary to our ethical principles (corruption, fraud, discrimination, harassment, etc.));
- reinforced the *FDJGroupForMe* external support service for employees at Group entities in France and in English-speaking markets.

This 24/7 service has been up and running since 2019 and provides healthcare assistance, social assistance and psychological support⁽¹⁾.

Occupational health and safety

The FDJ occupational health and safety (OHS) policy relies on a specific management system to implement employees' work environments and ensure that they are operational; to promote operational performance and quality of work life; and to protect the health and guarantee the safety of all employees.

FDJ Group is as committed as ever to occupational health and safety. This is reflected in:

- prevention training and awareness campaigns geared towards managers, employees, service providers and suppliers. A total of 605 employees were able to complete training under the annual training plan in 2022. New hires complete occupational health and safety training as part of the onboarding programme;
- checks on the OHS management system and internal and external audits;
- regular work-related risk assessments;
- the implementation of OHS action plans at each site;

(1) Telehealth consultations, health advice, medical concierge services, assistance in areas relating to family, work, housing, budget, etc.; together with personal assistance and support for people affected by a traumatic event.

- regulatory compliance analyses addressing themes relating to the environment (air quality, noise pollution, waste, water, risks, facilities requiring an environmental impact assessment, urban planning and nature); energy (energy performance of equipment, energy production and distribution, audits and analyses); transport; health and safety (lay-out of work areas, workplace accidents and occupational diseases,

occupational health and safety commission, specific working conditions, in-house company document, work equipment, electrical installations, prevention, hazardous products, lifting equipment, occupational health unit);

- performance monitoring in relation to the manner in which the occupational health and safety (OHS) management system functions.

FREQUENCY AND SEVERITY RATES

	2021						2022					
	Number of hours worked	Number of workplace accidents with lost time	Number of commuting accidents with lost time	Number of days lost	Frequency rate	Severity rate	Number of hours worked	Number of workplace accidents with lost time	Number of commuting accidents with lost time	Number of days lost	Frequency rate	Severity rate
FDJ	2,265,112	2	4	100	0.88	0.01	2,434,742	9	4	275	3.70	0.11
FDJ Group	3,831,562	5	7	159	1.30	0.01	4,005,390	10	5	278	2.50	0.07

Frequency rate: number of lost-time incidents per million hours worked. Severity rate: number of days lost per 1,000 hours worked.

PERFORMANCE INDICATOR: ABSENTEEISM RATE

	2021	2022
FDJ	2.43%	3.34%
FDJ Group	2.50%	3.40%

The absenteeism rate reflects days of absence resulting from illness, workplace accidents and commuting accidents, divided by the number of theoretical days worked for the relevant year.

Mirroring its commitment to supporting the French sporting community, FDJ Group has introduced a series of measures to facilitate and promote physical activity for its employees: staff have access to three in-house gyms located at major sites in Metropolitan France, with membership fees subsidised by their Economic and Social Committee (CSE); sports clubs have been set up at our sites; FDJ Group subsidises and supports employees who wish to take part in non-Group sports events (running events, Paris 2024 events, etc.); sporting weekends are organised for staff, together with in-house events that promote cycling; and bike parks and changing rooms are available at our sites.

8.5 ENSURING EMPLOYEE ENGAGEMENT

Employee engagement is a key contributor to company performance. FDJ measures employee engagement by surveying all Group employees each year in the form of:

- an in-depth employee climate survey. The aim of this exercise is to monitor the level of employee engagement and other key indicators (quality of work life, management, etc.);
- a simplified employee climate survey.

These surveys, which are conducted in alternate years, assess employee engagement in five categories: job satisfaction, loyalty to the Company, motivation to do more, recommendation of the Company as an employer and pride in working for the Group.

An employee climate survey was conducted at FDJ Group in 2022. The results of the survey revealed some very positive views in most of the areas assessed, with a very high participation rate (67% response rate).

They reflect a workforce that is engaged (89/100) and happy to work at the Group, with a trust in their manager and in the future of their organisation.

PERFORMANCE INDICATOR: EMPLOYEE ENGAGEMENT RATE

	2021	2022
FDJ Group	91/100	89/100

The engagement indicator that emerged from the 2022 FDJTeam survey came to 89/100 (down 2 points on the 2021 FDJScope survey). The engagement rate had also been measured in 2020 as part of an ad-hoc survey into the effects of the public health crisis, and came to 92/100.

Outlook

By 2025, the Group aims to keep the employee engagement rate at a high level of more than 85/100.

9. Solidarity

9.1 SOCIETAL ENGAGEMENT

FDJ has been committed to the greater good since it was founded as a successor to the French national lottery, which was created to help wounded World War One soldiers. Its contribution to society is a key component of its raison d'être and thus its business model. Its initiatives are divided into three categories: engaging with society through its Corporate Foundation, supporting French sports and contributing to the preservation and renovation of French heritage sites.

PERFORMANCE INDICATOR: CONTRIBUTIONS TO GENERAL INTEREST CAUSES

	2021	2022
FDJ Group	€108m	€137m

FDJ donated €137 million to general interest causes in 2022, including funding for the Agence Nationale du Sport, donations to the Fondation du Patrimoine and the endowment made to the FDJ Corporate Foundation. This information was taken from the BDO-Bipe study into FDJ's economic and social impact.

FDJ introduced a sponsorship strategy in 2021 in another reflection of its raison d'être, with three key focuses: responsible gaming, equal opportunities and strong local roots. This strategy is aimed at consolidating and furthering the various sponsorship initiatives led by FDJ Group and its Foundation.

9.1.1 THE FDJ CORPORATE FOUNDATION

The FDJ Corporate Foundation, founded in 1993, works to promote equal opportunities. It provides support to associations that use social innovation and game-based learning approaches to educate and integrate vulnerable members of society, people who may suffer from a disability, hardship or isolation. The FDJ Corporate Foundation has been able to use the €19.5 million it was allocated for 2018-2022 (incorporating an additional €1.5 million endowment to address the problems faced by young people because of the public health crisis) to support around a hundred initiatives a year throughout France. In 2022, the FDJ Corporate Foundation provided €4.4 million in funding to its partner associations.

Over the five-year period spanning 2018-2022, more than 300,000 people received integration or education assistance from the FDJ Corporate Foundation, through projects selected on the basis of five criteria: general-interest projects with a recreational angle to promote equal opportunities; innovation or differentiation in the project's field of intervention; clearly identified social impact goals; projects that can be reproduced nationwide; and alignment with a co-building approach with the FDJ Corporate Foundation.

In those five years, the Foundation has supported initiatives to close the digital divide, to integrate vulnerable people into society and the world of work and to integrate people with a disability. It has successfully worked to promote a sense of solidarity throughout the Group's workforce, by developing

skills sponsorship programmes for partner associations. In 2022, FDJ Group employees devoted more than 7,500 hours of their time to these skills sponsorship programmes. More than 120 employees have also signed up to take part in mentoring initiatives to help young people.

The five-year budget for the Foundation, which will celebrate its 30th anniversary in 2023, has been increased to €25 million for 2023-2027.

Impact of the FDJ Corporate Foundation

The Group teamed up with a specialised firm in 2021 to conduct a social impact study, the results of which were published in 2022. A total of 22 interviews were conducted with the associations supported by the FDJ Corporate Foundation, representing more than 80% of the Foundation's endowments. 97% of the associations surveyed said they were very satisfied with the support received, mainly because it has enabled them to increase in scale, develop their skills and become more visible.

Three key figures reflect the impact on the ultimate recipients of the Foundation's support:

- 84% say they feel more motivated;
- 80% say they feel more able to put their poor self-image aside and take the driving seat in their personal journey;
- 78% say they feel more confident.

Lastly, the monetary value of the FDJ Corporate Foundation's impact has been calculated: for every euro invested by the Foundation, €3.4 worth of value is created for society.

Projects supported

Funding for the large projects backed by the FDJ Corporate Foundation is provided over a number of years. In 2022, some projects were in their second or third year of funding. Examples:

- "Entourage" works to address the isolation of homeless people by giving them access to the support networks they need;
- "Comme les Autres" provides social support services through sports and thrilling experiences for people who have suffered a physical disability following an accident. Its career guidance programme works to facilitate the integration of disabled people into the workforce;
- "Café Joyeux" is France's first network of cafés-restaurants to train and employ people with a mental and cognitive disability (as "crew members"). The aim is to train personnel so that they can secure a State-recognised diploma;
- "Fête le Mur" is a social and sporting association that has developed an innovative educational programme using song to help students memorise lessons given by their teachers in class;
- "L'Académie Diomède" goes right to the centre of the French education system, relying on a three-part methodology: school-related, social and sports-related. It uses football as an educational tool to train future adults.

The seven associations selected as part of the 2020 call for projects⁽¹⁾ have also been able to continue their actions.

Lastly, the €2 million youth programme set up to meet the basic needs of young people (housing, food, etc.) and prevent them from becoming isolated and dropping out of school, helped 15,000 struggling young people through the actions of four associations:

- "Les Restos du Cœur", which provides food packages to people who visit their centres and helps those in need, particularly young people, to use digital tools to learn about their rights, carry out administrative formalities, find out information and access training;
- "Apprentis d'Auteuil" and their ProPulse programme: this stepping-stone helps young people pick themselves up and prepare to join a work-study programme. It also gives them added tools by ensuring that they have the basic hard skills and soft skills needed to succeed, together with career guidance support through internships;
- "Afev" and its two programmes supported by the Foundation: a system of mentoring to ease new undergraduates into the student community, and "Kolocations à Projets Solidaires" to address the housing problems faced by young people and give them a way to engage with residents in their local areas. Funding has also been provided for an emergency student fund;
- "Article 1" and its Jobready programme: this digital in-person programme seeks to pinpoint and build on young people's soft skills to make it easier for them to find employment. It allows the skills of each young person to shine through, while also putting a spotlight on, and providing insight into, all manner of career paths and experiences to speed up their entry into the workforce.

Dedication to serving territories and promoting equal opportunities

The network of more than 30,000 points of sale nationwide gives the Foundation special access to agents who are working to develop local communities and are committed to promoting equal opportunities.

Each year, the FDJ Corporate Foundation invites the Group's retailers to participate in a solidarity initiative by submitting a community project that is close to their heart. The

associations behind these initiatives must be specifically focused on the Foundation's sphere of action, i.e. education and the integration of vulnerable populations. In 2022, 103 associations received funding of up to €3,000.

Local associations interested in submitting a solidarity-oriented project to the Foundation must be sponsored by a retailer. This forges connections between local organisations while also expanding FDJ Group's regional roots through its Foundation.

Employees committed to solidarity

In 2022, 239 employees got involved in the 42 solidarity initiatives proposed by the FDJ Corporate Foundation. 2022 also saw:

- the introduction of long-term skills sponsorship programmes, giving employees an opportunity to lend their support to associations partnered by the Foundation for periods ranging from anywhere between six months and two years;
- the launch of a mentoring challenge: at the end of 2022, 127 employees had signed up to become mentors with our partners Article 1, Télémaque, Nos Quartiers ont du Talent and Unis-Cité.

Some 340 employees have also registered to take part in the "Arrondi sur Salaire" programme, whereby their pay will be rounded down to the nearest euro and the remaining cents donated to associations partnered by the FDJ Corporate Foundation.

Lastly, each year since 2017, the "Tremplin Collaborateurs Solidaires" programme enables FDJ Group employees to submit applications to fund projects that are close to their hearts and are led by local associations. In 2022, eleven chosen associations received donations ranging between €3,000 and €15,000.

PERFORMANCE INDICATOR: AMOUNT OF FINANCIAL AID GRANTED BY THE FDJ CORPORATE FOUNDATION

	2021	2022
FDJ Group	€4,765k	€4,414k

9.1.2 SPORT

FDJ has been committed for more than 30 years to developing French sport and promoting its values, particularly in terms of ethics and inclusiveness (support for women's sports and disabled sports).

Women's sports

The "Sport pour Elles" programme launched by FDJ in 2016 hinges on four pillars: access to athletic activities for all

women and girls, particularly those who have few opportunities to play sport because of social, economic or geographical impediments; more women in sports governance; performance support; and greater media coverage of women's sport. This programme includes initiatives launched by FDJ Group, such as "Buts pour Elles", as well as the "Performance pour Elles" call for projects, and partnerships with major cycling competitions Paris-Roubaix Femmes and Tour de France Femmes, which returned in 2022, together with sponsorship for a women's FDJ SUEZ-Futuroscope cycling team.

(1) AFEV's "Accompagnement vers la lecture" reading and writing mentoring initiative, Each One's "Chacun en mouvement" project, the Paris Philharmonic's "Demos" project, an adaptive learning video game initiative led by the E2C network, the "Télémaque Pro" social mobility project, the "L dans la Ville" programme put together by the Sport dans la Ville association, and a change of scale for the "Cartable Fantastique" initiative developed for school children with a disability.

With the “Performance Pour Elles” programme, FDJ has been committed to developing women's sport at the highest level since 2018. In 2022, it selected six sporting federations working to improve women's involvement in high-performance sports in preparation for the Paris 2024 Summer Olympics and Paralympics. FDJ has allocated a total of €100,000 to be divided among these six federations:

- the French Rugby Federation will use the funds to provide clubs participating in the Élite 1 Féminine championship with access to technological tools designed to enhance player performance;
- the French Dance Federation will use the funds to organise a mixed preparation breaking programme to help B-girls prepare for the next major international events and to continue to shape breaking as a sport, bearing in mind that it will be a new event in the Paris 2024 Olympics;
- the French Athletics Federation will use the funds to set up a nutritional and mental health monitoring programme for 30 female athletes in order to analyse, prevent and address any eating disorders;
- the French Judo Federation will use the funding for a high-performance programme involving 24 female athletes with a view to ensuring their physical safety and closely monitoring their moves;
- the French Tennis Federation will use the funding so that the members of the girls elite wheelchair tennis group can take part in six training programmes at its national training centre;
- the French Rowing Federation will use it to introduce personalised science-based programmes to monitor training loads for 15 female rowers according to their menstrual cycle.

As part of its partnership with the Paris 2024 Olympic and Paralympic Games, FDJ conducted its “Women in Sport” survey again in 2022 to see how things have evolved and to identify the factors that can hinder or encourage women in France from getting involved in a sport.

FDJ has also joined the Paris 2024 “Impact 2024” Legacy programme to support 400,000 women in their sporting endeavours. A special category has been created in the Impact 2024 call for bids aimed at promoting women's involvement in sport. The goal is to back transformative projects that factor in the ambitions and needs of women today (well-being, health, physical condition), together with their personal circumstances and their desire to get involved more freely in sport. Through its engagement with Impact 2024, FDJ was able to support 11 projects in 2022.

Support for elite athletes

Building on its work to support young champions for more than 30 years, the Group launched the FDJ Sport Factory in 2019 to help high-level French athletes accomplish their goals. Since then, FDJ Sport Factory has been working with 27 athletes and

been serving as an incubator for young talented athletes all hoping to win an Olympic or Paralympic medal at the Tokyo 2020, Beijing 2022 and Paris 2024 games. Athletes from the FDJ Sport Factory secured 10 medals between them at the Tokyo Olympic and Paralympic Games, and winter games athletes who trained with the FDJ Sport Factory went on to win 8 medals at the 2022 Beijing Olympic and Paralympic Games.

Beyond the financial support that is provided, FDJ Sport Factory athletes are able to follow a training programme at prestigious schools such as Sciences Po Paris and EM Lyon, and receive English lessons through the 7speaking linguistic training platform. They also have full access to the “Sport Compétences” programme, which has been designed to harness the skills athletes acquire in their sporting careers so that they can use them later on after they retire from the competitive circuit and begin another career. The CDES (Centre for the law and economics of sport) has prepared fact sheets to help former athletes set up their own business.

The various tools available to athletes to help them prepare for their lives after competitive sports are presented at the annual FDJ Sport Factory seminar each year.

9.1.3 HERITAGE

In 2022, FDJ launched the fifth annual “Mission Patrimoine” operation. The Group sold specific games (one scratch game and six Loto® draws + a Super Loto® draw) and donated a portion of the stakes to the French national heritage foundation in favour of local projects to restore dilapidated heritage buildings. More than €126 million has been collected for the heritage foundation⁽¹⁾ since the games were launched four years ago, and 745 sites have benefited from the programme. In 2022, the programme financed work at 18 iconic sites and a hundred other selected sites.

In 2021, FDJ Group extended its cooperation with the heritage foundation until 2024, with a plan to allocate €2 million to the programme. Each year, it will also support a specific restoration project put forward by the heritage foundation. The FDJ Corporate Foundation donated €400,000 in 2021-2022 to fund social inclusion and pathway-to-work programmes at selected restoration sites.

The first project supported by the Group as a sponsor of the heritage foundation is the restoration of the YMCAC's Paris premises, which is included on the French additional registry of historical monuments (*inventaire supplémentaire des monuments historiques*) and houses a hostel for students or young workers who have just arrived in Paris, together with various cultural and sports facilities. The building also houses the world's oldest basketball court. The renovation work will enable this ageing building to recover a social dimension and serve local residents too. In all, the exceptional support put in place over a two-year period will see FDJ finance up to €1 million of the work on the site, with a further €400,000 to be allocated by the FDJ Corporate Foundation.

(1) <https://www.fondation-patrimoine.org/>

9.2 DIALOGUE WITH STAKEHOLDERS

Dialogue with stakeholders has been a mainstay of FDJ's CSR policy for more than 20 years. The in-depth and fruitful dialogue it has forged with its stakeholders enables the Group to harness a wide range of expertise and experience, and helps enrich the initiatives taken to address the inherent impacts of the gaming industry. To give structure to its relations with stakeholders, FDJ has opted to forge a dialogue gradually and more extensively over time. This commitment is reflected in the establishment of various ad hoc committees and bodies:

- as early as 2010: a Committee of Responsible Gaming Experts was set up, and has since been systematically referred to when a new game or version of a game is being developed. The input provided and points requiring attention raised by the experts can lead to adjustments in certain game parameters and/or additional studies. The committee is made up of specialists in the fields of addiction and human sciences;
- 2014: the Social Laboratory was set up as a forum to discuss the Company's key CSR issues. It is jointly involved in shaping and suggesting actions to further enhance FDJ's CSR policy. It brings together representatives of organisations from civil society;
- 2020: a Stakeholder Committee was formed to facilitate a dialogue between the Group and the organisations in its socioeconomic environment on key aspects of its operations, and to monitor the efforts made to honour the commitments announced by the Group when it published its *raison d'être* (see section 1.2.2 A Stakeholder Committee to monitor the efforts made to honour the commitments relating to FDJ's *raison d'être*).

Actions of the Social Laboratory

The Social Laboratory was set up to co-build CSR initiatives with civil society. Consultations are organised by a specialised agency acting as a third-party facilitator. Based on the Chatham House rule⁽¹⁾, 13 civil society organisations (CSOs) and as many contacts within the FDJ Group regularly come together to examine sensitive topics relating to the Company's CSR and responsible gaming policy.

The Social Laboratory met three times in 2022:

- the April session focused on preventing underage gambling online. To provide some context for the session, SEDAP talked about the findings of the ENJEU study carried out to assess gaming and gambling habits in

minors. FDJ then reminded the participants of the measures it has put in place to prevent underage gambling (prevention messages, training, partnerships, etc.). Later on in the session, the e-Enfance association placed an emphasis on the attitude to be adopted with minors to prevent underage gambling;

- the July session focused on emerging trends in entertainment and discussed the findings of a study carried out by addiction-related social epidemiologist, Jean-Michel Costes, into pay-to-win games and "loot boxes". His research points to an increasingly blurred line between video games, gaming and gambling, and describes the risks this involves for players. Le Cube then raised the issue of how video games have been evolving, with an increasing trend towards monetisation for a number of years;
- the November session covered the role that local retailers have to play as a vector for social connection. It was held at a retailer's premises in the Paris suburb of Puteaux, with an introductory message from Vincent Chabault, a sociologist who lectures at Université de Paris and Sciences Po. He talked about the notion of social connection and the changing role of local retailers.

PERFORMANCE INDICATOR: NUMBER OF CIVIL SOCIETY ORGANISATIONS (CSOS) BELONGING TO THE SOCIAL LABORATORY

2021-2022 cycle	2022-2023 cycle
12 CSOs	13 CSOs

PERFORMANCE INDICATOR: PRESENCE OF THE MEMBERS OF THE 13 CSOS AT SOCIAL LABORATORY SESSIONS

2021	2022
66%	69%

Furthermore, a quarterly newsletter was introduced in 2022 to report on the key areas covered by our various dialogue structures: Committee of Responsible Gaming Experts, Social Laboratory and Stakeholder Committee.

(1) Confidentiality rule serving to protect the anonymity of speakers. Participants are free to use the information gathered at meetings, but may not disclose the identity or affiliation of the persons providing the information, nor may they disclose the identity of any other participants.

10. Territories

FDJ relies on a network of nearly 30,000 points of sale across France to distribute its products. The sale of FDJ games represents a major portion of the business generated by the bars, tobacconists and newsagents that make up the bulk of the distribution network. With points of sale in more than 11,000 cities, towns and villages nationwide, the Group boasts the largest local sales network in France.

With this in mind, through its activity, FDJ contributes to the economic development of local communities, and notably supports local points of sale in rural and/or disadvantaged areas. The Group has been working for many years to upgrade these points of sale by introducing a digital user experience and the digital collection of stakes. Each year, more than €15 million is invested in the renewal of equipment.

In 2022, retailers received total net point-of-sale commissions of €965 million (compared with €901 million in 2021).

10.1 SUPPORT FOR THE POINT-OF-SALE NETWORK

FDJ Group is as determined as ever to support local business and maintain its nationwide coverage, particularly in rural areas. This is reflected in its decision to place a moratorium on the halt to FDJ product sales at points of sale that generate low levels of business and to continue economic support measures.

Support for retailers

This initial support mechanism was introduced in conjunction with Impact Partners in 2020. It was extended to cover 2021 and repeated again in 2022. These far-reaching support measures have been developed to advise and empower retailers in struggling neighbourhoods. The programme covers three areas:

- administrative support (dealings with banks, payment of taxes, sale of business assets, etc.);
- real estate issues (dealings with landlords, insurers, legal procedures);
- commercial approach (diversifying, reorganising points of sale, growth avenues, etc.).

Once all these aspects are looked at, retailers continue to receive support to ensure that the measures pay off. More than 450 points of sale have received assistance so far.

10.1.1 SUPPORT FUND FOR SMALL RETAILERS IN VULNERABLE AREAS

This second support mechanism was launched by Impact Partners in association with BPI France in 2021. FDJ has contributed €15 million to the €35 million "Rebond" investment fund. The purpose of the fund is to enable hundreds of retailers to continue to operate as a going concern and develop further.

Deployed over several years, Rebond will facilitate the financial restructuring, transfer and reorganisation of small retail outlets in vulnerable areas (priority urban districts,

rural regeneration zones and towns covered by the town-centre action ("Actions Cœur de Ville") programme). This involves a system of participating loans or unsecured bonds, with a unit value of anywhere between €20,000 and €250,000. Around 17 retailers had accepted this assistance by the end of 2022.

10.1.2 SUPPORT FOR RETAILERS WHO ARE STRUGGLING FINANCIALLY

FDJ has introduced a third mechanism by teaming up with an association called Crésus, specialised in finding arrangements with creditors, to help retailers who are in great financial difficulty. Crésus provides regular support, for as long as needed, to struggling retailers that have been identified by the sales force. It reviews all the problems facing retailers and helps them analyse the situation, come up with solutions and put them into action. The aim is to provide support as soon as a retailer shows any sign of difficulty and help them best manage their cash flow.

Support for the victims of traumatic events

Lastly, FDJ also decided during the year to introduce an additional support service for retailers and their staff who may have experienced traumatic events at work (assault, burglary, armed attack, fire (criminal or otherwise), etc.).

Together with France Victime (a recognised public utility association), FDJ has introduced various support services which retailers can access by calling a special phone number. These services include:

- a kind ear and emergency support in the immediate aftermath of a traumatic event (post-traumatic shock, psychological support and guidance, etc.);
- comprehensive support (legal, social and psychological assistance) over the longer term;
- access to a network of 130 local associations, representing 1,500 specialists on the ground.

10.2 DIVERSIFICATION OF SERVICES AT POINTS OF SALE

FDJ has been developing services since 2019 to make it possible for any member of the public to make a payment at points of sale in the FDJ network. This diversification is part of an effort to support the network of FDJ retailers at a time when the revenue they are making on their "core" activities is dwindling. The aim is to satisfy demand for payment services among some members of the public and to open up new growth avenues for retailers.

FDJ has teamed up with the Confédération des Buralistes (tobacconists confederation) to provide a "pay point" service for the French Treasury (DGFIP) to enable users to pay tax bills of under 300 euros, public service bills and fines, in cash or via debit/credit card. This service, launched in July 2020 and now available at nearly 14,300 points of sale, is ideally suited to users who prefer a more personal touch and/or need assistance to make a payment. It also gives added impetus to the development of diversified activities at participating bars, tobacconists and newsagents. In 2022, FDJ retailers collected more than two million payments on behalf of the French Treasury.

FDJ is very keen to build on this success. In December 2021, it formed a subsidiary under the name of FDJ Services, which brings together its Payment & Services activities and is licensed to operate as a payment institution by the ACPR (Autorité de Contrôle Prudentiel et de Résolution - French prudential supervision and resolution authority)⁽¹⁾. Under this licence, FDJ is authorised to offer collection services on behalf of private sector organisations. The new service will begin in 2023. With Nirio, the brand name chosen for the service, users will be able to go to any of the 9,398 FDJ points of sale that have been registered as an FDJ Services Agent with the ACPR to pay their rent, their water bills or their electricity bills for example.

FDJ wants to extend the range of services provided by its PoS network to include services such as a cash deposit facility, making its points of sale veritable "local service hubs".

As a parallel to this, FDJ Services is working on developing a range of services, particularly in finance, for retailers who belong to the network. This saw it acquire Aleda and L'Addition in 2022.

10.3 ECONOMIC AND SOCIAL CONTRIBUTION

To further assess its economic and social contribution in France, FDJ renewed the annual survey that has been conducted by BDO-Bipe (Bureau for economic information and forecasting) since 2018. In 2022, FDJ's contribution to France's gross domestic product (GDP) was evaluated at €6.5 billion, with 55,300 jobs created or made permanent throughout the country (of which 22,000 with bars, tobacconists and newsagents). FDJ plans to keep the number of jobs created or made permanent through its business above the 50,000 mark.

PERFORMANCE INDICATOR: FDJ'S CONTRIBUTION TO FRENCH GDP

In billions of euros	2021	2022
FDJ Group	6.2	6.5

PERFORMANCE INDICATOR: NUMBER OF JOBS CREATED OR MADE PERMANENT

	2021	2022
FDJ Group	54,450*	55,300

* On an adjusted scope basis factoring in the National Sports Agency for jobs supported in 2021 (impact of - 350 jobs for FDJ in 2021), with no impact on the other metrics.

PERFORMANCE INDICATOR: FDJ'S CONTRIBUTION TO JOBS IN THE BAR-TOBACCONIST-NEWSAGENT SECTOR

	2021	2022
FDJ Group	21,100	22,000

FDJ's operations involved the employment of the equivalent of 22,000 people through the business generated by retailers (mainly bars, tobacconists and newsagents) in the point-of-sale network in 2022.

FDJ also contributes to the creation of local jobs through purchases sourced mainly in France from suppliers with which it works directly and indirectly. FDJ Group's French entities made 87.5% of their purchases (in value) in France, i.e. close to €591 million.

(1) Oversight body for the banking and insurance sectors.

PERFORMANCE INDICATOR: PERCENTAGE OF PURCHASES (IN VALUE TERMS) MADE FROM SUPPLIERS LOCATED IN FRANCE

	2021	2022
FDJ	90%	88%
Group, France	90%	90%

For 2022, the data relating to purchases is aligned with the data contained in the financial statements. 88% of the purchases made by the Group's French entities were sourced in France. These purchases were made from suppliers located across almost the entire country (see map below).

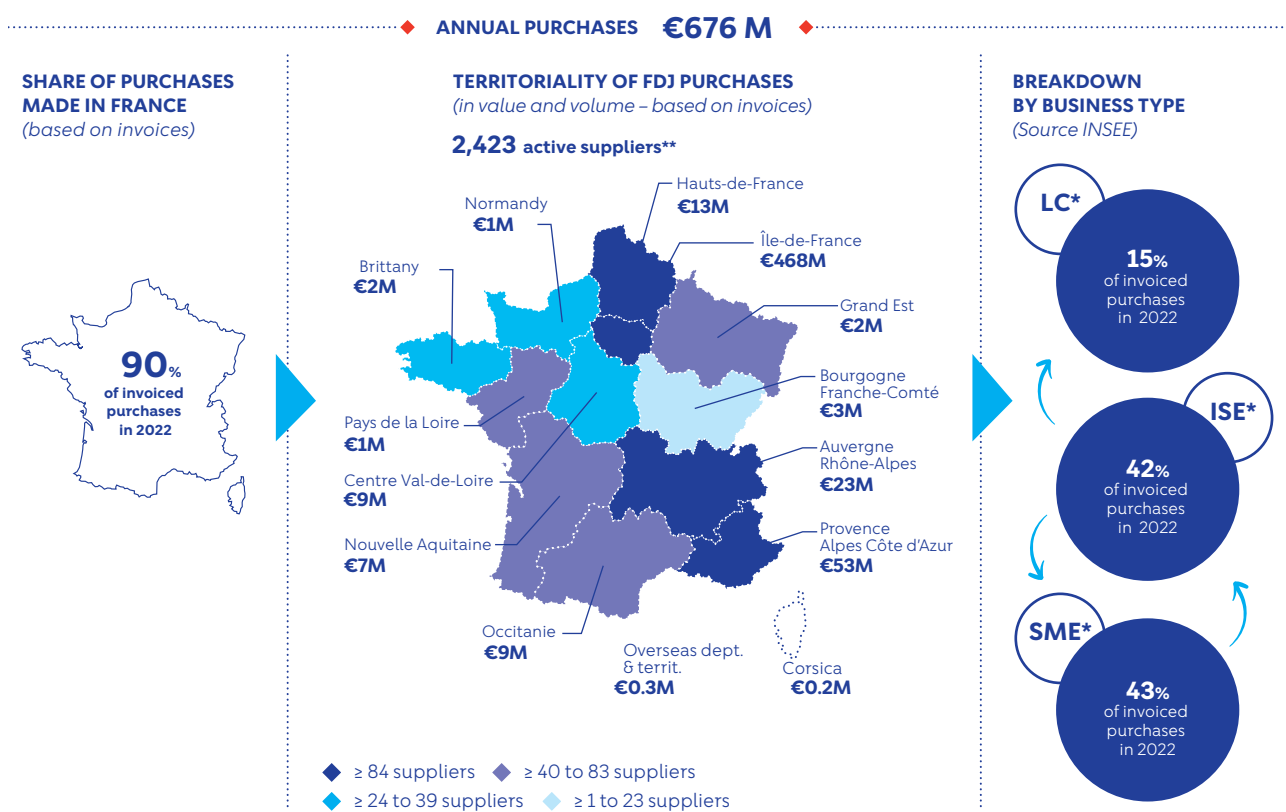
The Ile-de-France and Provence-Alpes-Côte d'Azur regions benefit from their proximity to FDJ Group sites.

PERFORMANCE INDICATOR: PERCENTAGE OF PURCHASES (IN VALUE TERMS) MADE FROM SMES AND ISES (OF THE PURCHASES MADE IN FRANCE)

	2021	2022
FDJ	58%	87%
Group, France	58%	85%

For 2022, the data relating to purchases is aligned with the data contained in the financial statements. 85% of the purchases made by the Group's French entities were sourced from SMEs and ISEs.

KEY FIGURES⁽¹⁾ SHOWING PURCHASES MADE BY THE GROUP'S FRENCH ENTITIES IN 2022



* LC: large corporates - ISE: intermediate-sized enterprises - SME: small and medium-sized enterprises.

** "Active suppliers": all suppliers with whom an order was placed and/or in respect of which an invoice and/or a credit note was issued in 2022.

(1) French entities: FDJ SA, FGS France, FDP, La Française d'Images, FDJ Services and DVRT 13.

11. Environment

FDJ has been working for nearly 15 years to reduce its environmental footprint, combat climate change and help meet the challenges of preserving the planet's biodiversity.

The environmental strategy being pursued by the Group is an integral part of its corporate governance and is regularly discussed at meetings of the CSR and Responsible Gaming Committee and at Board of Directors meetings.

11.1 COMBATING CLIMATE CHANGE

FDJ Group has been committed for more than ten years now to cut the carbon emissions caused directly and indirectly by its operations.

FDJ is going above and beyond its carbon reduction commitments to hasten awareness among employees of the importance of climate action and to get them to step up their efforts even further to achieve environmental targets. This has translated into concrete awareness actions geared towards everyone at FDJ, including the members of the Management Committee:

- in July 2022, all members of the Group Management Committee completed a session on climate change and loss of biodiversity at a meeting that focused on environmental issues;
- to coincide with European Sustainable Development Week (ESDW), which saw events being staged between 18 September and 8 October 2022, Group employees were invited to attend a conference on climate action that was organised and presented in association with WWF (World Wildlife Fund). A guide to eco-gestures was also uploaded to the Group Intranet portal, and a "My Little Planet" green challenge⁽¹⁾ and online workshop on digital eco-actions were also held. In all, 315 people took part in the various events held over the course of the week;
- various Climate Fresk workshops were also held, particularly during ESDW. The Climate Fresk is a French NGO that has developed a game to help people understand the causes and consequences of climate change. A special session was held for staff at the Purchasing department, attended by 26 people.

In 2023, a workshop will be organised for the members of the Group Management Committee. Other sessions are also planned.

11.1.1 MEASURING THE GROUP'S CARBON EMISSIONS

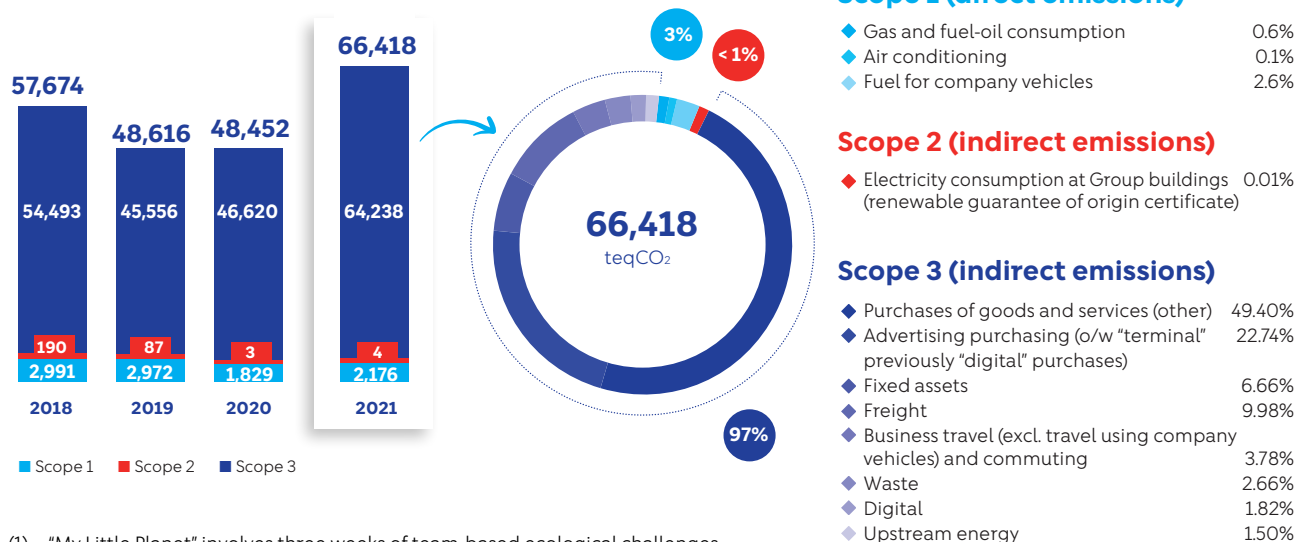
FDJ has been conducting carbon assessments since 2008 in order to monitor greenhouse gas emissions caused by its operations and move ahead with its carbon reduction policy. In order to closely monitor progress in reaching its reduction targets, the Group decided to make the carbon review an annual exercise from 2017, which was set as the reference year.

The carbon review takes all emissions in Scopes 1, 2 and 3 into consideration:

- Scope 1: carbon emissions produced by the Group's gas and fuel consumption, use of air conditioning and fleet of company vehicles;
- Scope 2: carbon emissions linked to purchased electricity, heating or cooling;
- Scope 3: carbon emissions tied to the purchase of goods and services, freight, fixed assets (buildings, equipment and furniture, company vehicles and IT equipment), employee travel (business travel and commuting) and waste.

The Group's activities are measured in terms of carbon emissions based on the GHG Protocol methodology, used by the SBT initiative to define the reduction targets described in the following paragraph.

PERFORMANCE INDICATOR: TREND IN CARBON EMISSIONS ACCORDING TO THE GHG PROTOCOL METHODOLOGY



(1) "My Little Planet" involves three weeks of team-based ecological challenges.

In 2021, the Group emitted 66,418 tonnes of CO₂e across its entire reporting scope. 97% of emissions were scope 3 emissions⁽¹⁾.

The increase in 2021 carbon emissions mainly stemmed from the return to standard operating conditions at the Group after the 2020 public health crisis. For the record, the emissions measured in the carbon assessment for 2020, which was the year in which the health crisis hit, were atypical. The growth in business recorded in 2021 triggered a sharp increase in certain emissions items such as freight and inputs (more spending on intellectual services and advertising).

In 2023, the Group will continue to enhance and refine the methodologies used to measure its carbon emissions, and will be looking to collect a certain amount of data directly from its suppliers.

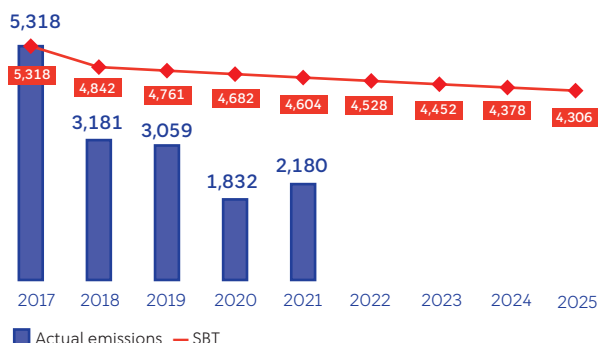
11.1.2 LOWERING CARBON EMISSIONS

In 2019, the Group set out an initial emissions reduction trajectory and four targets to shrink its footprint by 2025. These targets were validated by the international Science Based Targets (SBT) initiative, launched in 2015 on the heels of COP 21, and designed to help organisations set out emissions reduction trajectories that are commensurate with the objectives of the Paris Agreement.

The four targets are monitored every year as part of the carbon review.

1. Reduce carbon emissions by 20% (Scopes 1 and 2) by 2025

TREND IN SCOPE 1 AND 2 EMISSIONS (in tonnes of CO₂e)



Scopes 1 and 2 emissions were reduced by 59% between 2017 and 2021 (i.e. -3,138 tonnes of CO₂e). The initial 20% emissions reduction target has thus been largely exceeded.

This reduction has been propelled by:

- a sharp decrease in energy consumption at the Group's sites between 2017 and 2021:
 - reduction in electricity consumption and purchase of a guarantee of origin (GoO) certificate,
 - reduction in fuel and gas consumption, leading to a 38% decrease in related carbon emissions (i.e. - 249 tonnes of CO₂e). This was thanks to,

- the replacement of technical equipment and the upgrade to more energy efficient systems,
- the implementation of an energy performance agreement ("contrat de performance" - CPE) for the Group's headquarters,
- and the signing of a CPE for the Aguesseau site in 2021;
- a fall in the use of company vehicles because of public health restrictions, leading to a 38% reduction in related emissions (i.e. - 1,025 tonnes of CO₂e), helped also by the application of the Group's policy on the use of cars, which is aimed at:
 - reducing the number of vehicles in use by granting "mobility credits" to eligible employees, whereby they are allocated a travel budget instead of a company car or alongside the use of a small electric car,
 - gradually replacing the existing combustion engine vehicles in the Group's fleet, including rechargeable hybrid vehicles, with fully-electric vehicles.

Currently, electric vehicles make up 23% of the entire fleet,

- taking into consideration the consumption of electricity associated with these vehicles. That is why all "mobile" employees (sales reps, sales managers, regional managers, training staff, etc.) receive eco-driving training to ensure they use their cars efficiently.

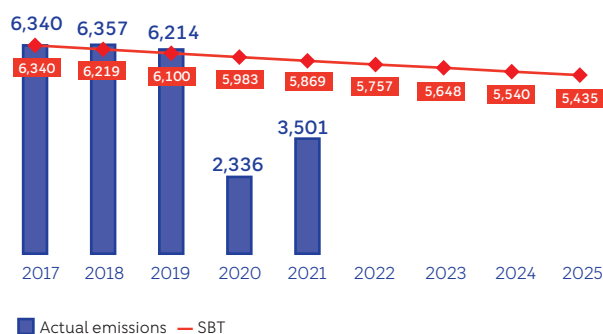
2. Take renewable energy purchases to 100% by 2025

In 2021, 99% of the Group's electricity came from renewable sources thanks to the purchase of guarantee of origin (GoO) certificates from EDF and the use of solar panels at the Pacifique des Jeux subsidiary site. The Group has set a goal to extend this initiative to the FDJ Développement subsidiary by 2025.

3. Lower carbon emissions by 15% (Scope 3, excluding purchases: business travel and commuting (excluding freight and company vehicles) and the use of energy (upstream)) by 2025

TREND IN SCOPE 3 EMISSIONS

- travel and upstream energy (in tonnes of CO₂e)



(1) The calculation does not include the subsidiaries acquired or formed since 2017, so as to gauge the progress made in hitting the reduction targets across the same scope as in the reference year (2017).

Since 2017, FDJ Group has cut by 45% (i.e. -2,839 tonnes of CO₂e) its scope 3 emissions relating to work-related travel (excluding travel using company cars (see above "Reduce carbon emissions by 20% (Scopes 1 and 2) by 2025") and to employee commutes, as well as to upstream energy use.

This reduction was largely attributable to the public health crisis, which led to restrictions on all work-related travel until September 2021. To maintain this downward momentum, FDJ will continue to pursue its policy of controlling business travel, by opting for videoconferencing where possible, and by encouraging employees to take the train.

As regards commuting, FDJ has stepped up its policy on remote working and has introduced cycling incentives to promote sustainable forms of transport. A number of measures have been taken: a new bike park has been opened at head office; training sessions are offered to promote cycling; subsidy schemes are applied (cycling mileage allowances), as are bike purchase bonuses and long-term bike leasing subsidies, etc.

4. Encourage suppliers who make up 65% of carbon emissions to work towards an ambitious GHG emissions reduction target as part of the SBT initiative for 2024

FDJ wants to encourage its biggest suppliers to reduce their carbon emissions, by setting a reduction target, validated by the SBT initiative, covering 65% of the emissions relating to purchases from them by 2024. This target covers three main categories of purchases: advertising, gaming materials and intellectual / IT services.

In 2021, 34% of carbon emissions attributable to Group suppliers were covered by the SBT initiative. In 2022, a number of other suppliers signed up to the initiative, which should drive up this percentage in the next carbon review.

Also in 2022, the Group embarked on a process of revising up its reduction targets with a view to halving its overall Scope 3 carbon emissions intensity by 2030. This updated target has been submitted for validation under the SBT initiative.

The aim of this exercise was to:

- incorporate the subsidiaries acquired or formed since 2017 into the Group's reduction trajectory;
- align the target with a 1.5°C warming trajectory by 2030 to comply with the new SBT initiative requirements.

11.1.3 STEPPING UP OUR ACTION PLAN THROUGH ENERGY SAVINGS

In 2022, FDJ decided to step up its environmental policy in the form of an energy sobriety plan. This plan involves taking concrete and practical action to save energy at the Group's French sites. It also fits in with the French government's national plan to reduce energy consumption.

The FDJ plan revolves around three key areas:

- reducing the energy consumption of buildings, by adjusting the indoor temperature and optimising lighting systems;

- reducing energy consumption relating to digital technologies, by adjusting cooling temperatures in IT rooms and deploying digital eco-actions;
- reducing energy consumption linked to travel, by scaling back work-related travel, adapting modes of travel and speeding up the switch to an all-electric fleet of company vehicles.

In December 2022, FDJ put its name to the Ecowatt Charter drawn up by RTE (France's power grid operator). In doing so, it agreed to further its efforts to reduce its electricity consumption, in keeping with its existing energy savings plan. This illustrates FDJ's determination to continue to play an active part in the national energy sobriety effort and, more generally, the national environmental strategy.

The results of these efforts will be known in 2023.

11.1.4 IMPLEMENTING A GREEN IT APPROACH

As a digital operator, FDJ is always seeking to improve its digital environmental and social footprint.

In 2019, FDJ Group conducted the WeGreenIT study in conjunction with WWF France to measure the impact of its IT systems and then look at ways it could reduce this impact.

This action plan covers two areas:

- data centres;
- user environment, in other words, the IT hardware used by employees.

On the heels of this study, a number of actions were taken to reduce the Group's environmental impact in these two areas:

- actions taken to reduce the environmental impact of data centres.

Examples of actions taken:

- increase in the density of physical servers to make the infrastructure more energy-efficient. This means that servers can store more data without having to increase in size, thus reducing the overall quantity of hardware needed;
- increase in the ratio of virtual servers to physical servers. As several virtual servers can run on a single physical server, this cuts down on the quantities of raw materials needed to be extracted from the earth to manufacture servers, and it also reduces the consumption of energy needed to power and cool these servers;
- replacement of hard disk drive (HDD) storage arrays with solid state drive (SSD) arrays, which have a longer lifespan and a better density/performance ratio, reducing the size of the hardware needed and hence the volume of electricity needed to power and cool the systems;
- a more energy-efficient lay-out of data centre rooms to reduce the environmental impact of the infrastructure. To achieve this, the temperature has been increased at data centres from 19°C in 2019 to 22°C in 2022. Hence, less energy is being used as air conditioning at the data centres has been reduced.

All these actions have helped reduce the PUE (power usage effectiveness) of the two FDJ data centres.

- Actions taken to reduce the footprint left by the user environment.

Examples of actions taken:

- decision to do away with the depreciation period for workstations in order to hold onto the hardware for as long as possible;
- repair of hardware (according to the availability of parts on the market);
- promotion of the development of more sustainable IT products (on both a social and environmental level);
- most FDJ workstations are TCO-Certified;
- The multifunction printers chosen by the Group are Blue Angel-certified, which guarantees that they have a long lifespan;
- proposal for employees to use a single phone for both work-related and personal needs in order to limit the number of phones in circulation and hence reduce the depletion of the earth's resources;
- addition of the sustainably-produced Fairphone to the Company's catalogue of smartphones for employees;
- systematic standby mode for workstations (laptops) in order to reduce energy consumption;
- donation of computers nearing the end of their useful life, with the help of the FDJ Corporate Foundation (103 in 2022). Any computers and other hardware (work phones, monitors and accessories (headsets, mice, keyboards, etc.)) that cannot be donated are given to ATF Gaia, a sheltered employment organisation that collects end-of-life hardware with a view to reconditioning it for sale or recycling it.

11.1.5 OFFSETTING RESIDUAL EMISSIONS

Alongside the actions being taken to shrink its carbon footprint, FDJ offsets all its residual greenhouse gas emissions every year, with a view to participating in the achievement of global carbon neutrality.

Carbon offset initiatives can contribute to achievement of the global carbon neutrality target by 2050, which is necessary to limit global warming, by funding projects that build up natural carbon wells (forests, soil, oceans, etc.) or help reduce carbon emissions around the world.

FDJ Group offsets unavoidable emissions by providing financial support for two projects. These projects are certified under the Verified Carbon Standard because they are both reliable and internationally-recognised by the United Nations, and help to avoid or capture certain emissions:

Preserving the Floresta de Portel forest in Brazil

The aim of this project is to protect a fragile ecosystem by preventing and averting deforestation and by helping local populations develop sustainable forest management, allowing the forest to regenerate naturally and protecting biodiversity. It also promotes the development of fair and sustainable income-generating activities, thanks to agroforestry and land management through forest conservation reserves.

"Ghandi" programme to develop wind energy in India

The Gandhi programme consists in developing clean and renewable energy in India, where 56% of energy demand is covered by coal, as well as building a more stable and more accessible power grid by developing wind energy. The project helps to reduce reliance on coal and also improve the environment and air quality.

11.1.6 ALIGNING WITH TASK FORCE ON CLIMATE-RELATED FINANCIAL DISCLOSURE (TCFD) RECOMMENDATIONS

FDJ Group has launched an initiative to identify and analyse climate-related financial risks and opportunities. In 2020, a review was conducted of the Group's existing practices in relation to the TCFD recommendations. The Group then mapped its climate-related financial risks and opportunities and prepared the associated roadmaps.

This section is organised according to the four TCFD pillars (governance, strategy, risk management, metrics and targets) and refers to other sections of the report for further details.

Governance

FDJ Group's governance bodies address the Company's Corporate Social Responsibility objectives.

Duties of board members (see section 2 CSR governance)

The CSR and Responsible Gaming Committee, which is made up of members of the Board of Directors, examines FDJ's CSR policy as a whole, including its environmental policy and the initiatives taken to address climate-related risks and opportunities. It reports regularly on its work to the Board of Directors. FDJ Group presented the results of its 2021 carbon assessment, carbon emissions reduction targets and associated action plans to the CSR and Responsible Gaming Committee in July 2022.

Duties entrusted to departments

Several Group departments are actively involved in identifying and managing climate-related risks and opportunities. They include the Commitment and Responsible Gaming department, the Audit, Risk, Control, Quality and Ethics department, the Technical department, the Commercial Operations department, the Purchasing department, the Operational Real Estate and Working Environment department and the Strategy and Innovation department.

Furthermore, FDJ Group's CSR policy is taken into consideration at the highest level of the organisation, as the head of Commitment and Responsible Gaming sits on the Group Management Committee.

Strategy

In the course of its business, FDJ is exposed to a number of risks and opportunities related to climate change, be they transition risks or physical risks.

In 2021, the climate-related financial risks and opportunities were mapped out extensively in order to follow the TCFD recommendations. This mapping exercise involved three stages: identifying the major climate-related risks and

opportunities in conjunction with in-house experts; prioritising the identified climate-related risks and opportunities; and preparing action plans commensurate with the prioritised risks and opportunities.

To mitigate the potential impact of the main climate change-related risks, or avoid them altogether, FDJ took risk management initiatives, which are described in this section and summarised in the table below. The table also lists the main climate-related opportunities identified by the Group.

Type of risks and opportunities	Risk / opportunity	Some FDJ Group achievements
Transition risks	Loss of brand appeal due to mounting consumer expectations regarding responsible engagement	<p>Surveys to gain more insight into customer expectations regarding CSR issues.</p> <p>Communication campaign showcasing FDJ's environmental engagement aired on a number of France TV channels, and consumer surveys to gauge how effective the television campaign is.</p> <p>Establishment of a partnership in October 2022 with "Gestes Propres", an association that is spearheading the fight against illegal dumping and littering.</p> <p>FDJ has decided to echo the message sent out in the association's new "litter" campaign encouraging the general public and customers to throw small items of litter into the bin, particularly used scratch cards. The video clip was shown at the 23,000 FDJ points of sale equipped with digital monitors and posted to social media channels between 3 October and 23 October 2022.</p> <p>85% of FDJ points of sale have introduced paper sorting bins for customers. The plan is for all points of sale to have such bins in early 2023. FDJ has been recycling all unused gaming materials since 2012.</p>
	Taxation of greenhouse gas emissions	<p>FDJ has set ambitious GHG emissions reduction targets for 2025 (see section 11.1.2 Lowering carbon emissions).</p> <p>FDJ helps to achieve global carbon neutrality by offsetting residual emissions (see section 11.1.5 Offsetting residual emissions).</p>
	Investor expectations	<p>FDJ regularly embarks on new action plans identified in non-financial ratings pertaining to the environment (Moody's ESG, S&P Global – SAM, CDP, etc.). In 2021, FDJ incorporated 2025 CSR objectives into the annual compensation packages of Corporate Directors. One specific environmental objective was set:</p> <p>a -50% reduction in direct carbon emissions (Scopes 1 and 2) relative to 2017 (see section 1.4 Ambitious CSR targets for 2025).</p>
Physical risks	Disruption of the distribution network due to an extreme event	<p>Introduction of a business continuity plan to address issues such as the impact of extreme weather events (e.g. provisions for buffer stock serving the network to overcome any disruptions).</p>
	Interruption of IT services due to an extreme weather event	<ul style="list-style-type: none"> – The ability to withstand extreme weather events is taken into account in the design stage for FDJ's data centres. – Prevention plan and IT continuity plan to address issues such as the risk of an extreme weather event.
	Supply chain breakdown due to an extreme weather event	<ul style="list-style-type: none"> – Dialogue regarding operational risk matters (including physical risks) with the suppliers of gaming materials, and audit of their business continuity plans and CSR policies. – Dialogue with strategic suppliers regarding a reduction in their carbon footprint: Ecovadis assessment of their environmental performance. FDJ has set a goal to encourage suppliers who make up 65% of the volume of GHG emissions to join the SBT initiative by 2024.

Type of risks and opportunities	Risk / opportunity	Some FDJ Group achievements
Climate-related opportunities	Decrease in operating expenses thanks to the implementation of a responsible digital policy	– FDJ assesses the environmental impact of its IT equipment through a WeGreenIT survey carried out in conjunction with WWF France. This survey found that a number of actions had already been taken and pinpointed others worth implementing.
	Decrease in costs through energy optimisation	– Purchase from EDF of electricity from entirely renewable sources with guarantees of origin for all FDJ sites and for all FDP sales agencies. – FDJ has entered into an energy performance agreement ("contrat de performance énergétique" - CPE) for the Group's headquarters. – FDJ is working on its alignment with the service sector decree ("Décret Tertiaire") (definition of the scope and benchmark years to be taken into consideration).
	Digital transformation of gaming	FDJ is working on the digital transformation of its lottery operations and on the development of its online sports betting products.

Risk management

The Enterprise Risk Management ERM function, which is part of the Audit, Risk, Control, Quality and Ethics department, covers all types of risk to which the Group may be exposed (strategic, operational, compliance and external risks). In accordance with the Risk Management system, FDJ Group has adopted a consistent and structured approach for the different stages involved in identifying, assessing and addressing its risks, and assists the business lines in analysing their own risks. This facilitates a comprehensive approach, as part of the Risk Management system, to the various risk factors (namely climate-related risk factors) identified throughout FDJ Group.

Metrics and targets

FDJ monitors and publishes an annual report on environmental indicators related to energy consumption, water consumption and waste production associated with its activities. The changes in these indicators, and their scope, are disclosed in the notes to this non-financial information statement. Greenhouse gas emissions in Scopes 1, 2 and 3 are assessed once a year using the ADEME Bilan Carbone™ (carbon assessment) methodology and the GHG Protocol methodology (see section 11.1.2 Lowering carbon emission).

Outlook

FDJ will implement the actions laid out in the roadmaps in order to mitigate the potential impact of climate change risks, or to avoid them altogether.

11.2 TAKING ACTION TO PRESERVE BIODIVERSITY

In addition to initiatives proving its commitment to combating global warming, FDJ Group endeavours to limit the impact of gaming materials on forest biodiversity.

Paper, sourced from wood, is a key resource used in the production of FDJ's gaming materials. The need to take care of the world's forests has been uppermost in FDJ's mind for more than ten years now, prompting the Group to play an active part in the protection of forests in France and across the globe.

11.2.1 REDUCING THE IMPACT ON BIODIVERSITY

Since 2012, 100% of gaming materials have been printed on paper from FSC®-certified sources ⁽¹⁾. The FSC (Forest Stewardship Council®) works to preserve the world's forests. The FSC label promotes the diversity of species, the preservation of soil, fauna and flora and helps combat the destruction of habitats and wetlands.

In 2020, FDJ conducted a second Life Cycle Assessment (LCA)⁽²⁾ of its gaming materials, for the purpose of quantifying their impact on the environment and biodiversity, and defining a sustainable production roadmap with practical solutions for future implementation. This assessment confirmed that the major impact on the environment lies in the manufacture of paper and printing of scratch cards. As for biodiversity, 98% of impacts come from logging operations. The biodiversity footprint of gaming materials was measured using the Global Biodiversity Score (GBS)⁽³⁾, developed by CDC Biodiversité (Caisse des Dépôts et Consignations).

In 2022, FDJ continued to conduct studies to assess the feasibility of a reduction in scratch card grammage in order to shrink their biodiversity-related footprint.

(1) Licence number: FSC®-N002595.

(2) The first LCA on gaming materials was conducted in 2009 and examined FDJ's impact on the environment only, not on biodiversity.

(3) The Global Biodiversity Score (GBS) was created by CDC Biodiversité in May 2020 as a tool for companies and financial institutions to measure their biodiversity footprint.

FDJ also embarked on a project during the year, in collaboration with FSC France, WWF France and CDC Biodiversité, to incorporate the requirements of the FSC label in the GBS in order to emphasise the positive impacts of the FSC forest management standard in terms of biodiversity. This made it possible to assess the impacts of FSC-certified logging on forest biodiversity, which is used in the manufacture of paper used to print scratch cards. The findings of the study showed that FSC-certified logging had a more positive impact on biodiversity by surface unit than non-certified logging. One of the main reasons is that FSC-certified forest concessions include "no-logging zones", which house very high levels of biodiversity.

FDJ has also teamed up with "Gestes Propres", which is spearheading the fight against illegal dumping and littering, by echoing the message sent out in its new "litter" campaign encouraging the general public and FDJ customers to throw small items of litter into the bin, particularly used scratch cards. The campaign's video clip was shown at the 23,000 FDJ points of sale equipped with digital monitors throughout October and posted to social media and relayed on "Gestes Propres" own social media pages. Another way to limit the impact of littering on the environment and on biodiversity.

11.2.2 SUPPORTING INITIATIVES TO PROTECT BIODIVERSITY

In addition to international carbon offset projects, FDJ funds a new project each year (for ten years) as part of the FSC's biodiversity ecosystem services programme. These globally-pioneering projects to protect the biodiversity of French forests are supported by FDJ and being developed in conjunction with FSC France and Sylvamo Forêts Services. Such programmes help protect forests and ecosystem services while holding an economic interest for forest owners through associated conservation initiatives.

- In 2019, FDJ funded a conservation programme covering several hectares of the forest of Saint Sylvestre, with a view to protecting old trees that provide shelter for many species of wildlife included on the International Union for Conservation of Nature's (IUCN) Red List of Threatened Species;
- In 2020, funding was provided for a conservation project covering several hectares of the forest of Saint-Pardoux-la-Rivière. The purpose of the project was to protect the trees along the banks of the Dronne and the diversity of the living creatures that need the river to survive;

- In 2021, FDJ financed a restoration project in the forest of Gravière in Cantal. Varieties of trees that are best suited to the changing climate were planted across several hectares of forest that had been destroyed by insects.

In 2022, FDJ financed three new "FSC Biodiversity Ecosystem Services" projects:

- in Indre-et-Loire: at a forest hit by a 2021 tornado that destroyed more than 60% of its resources, measures will be taken to safeguard existing habitats and develop new ones for rare and endangered species;
- in Creuse: a forest used as a nesting ground by many protected bird species will be managed with a view to safeguarding the trees that form ideal habitats for protected species, and developing new habitats;
- in Dordogne: a series of measures will be put in place to protect wetlands (quality, flood prevention) in a forest that houses very diverse habitats (ponds, watercourses, young and older hardwoods and softwoods, rocky masses, etc.). The wetlands are an ideal habitat for various protected and/or endangered species such as the white-clawed crayfish (present in this forest).

By participating in these projects, FDJ has provided financing to help preserve and/or restore more than 100 ha of forest in France.

Furthermore, given the extent of the fires that swept through French forests last summer, FDJ Group donated €200,000 to the "ONF - Agir pour la Forêt" fund managed by the French national forestry office to help in the national effort to save and restore these forests.

Of this, 80% was pledged to the restoration of public woodlands in Gironde (Lauridas and La Teste-de-Buch). The remaining 20% was allocated to the restoration of public woodlands in Brittany (state-owned forests in Rennes and Villecartier), Pays de Loire (Baugé) and Poitou-Charentes (Grolle).

PERFORMANCE INDICATOR: PERCENTAGE OF GAMING MATERIALS PRINTED ON PAPER FROM FSC®-CERTIFIED RESPONSIBLE SOURCES

	2021	2022
FDJ Group	100%	100%

12. Application of the Green taxonomy: methodological approach and KPIs

The European Green Deal aims, among other things, to redirect capital in order to fund sustainable and inclusive growth, to reduce greenhouse gas emissions by at least 55% over the period spanning 1990-2030 and to make Europe a net-zero emitter of greenhouse gases by 2050.

Pursuant to Regulation (EU) 2020/852 of 18 June 2020 on the establishment of a framework to facilitate sustainable investment in the European Union (EU), FDJ Group is required, in respect of the financial year ended 31 December 2022, to disclose the proportion of the revenue, capital expenditure (CAPEX) and operating expenditure (OPEX) that is associated with economic activities that are considered eligible and aligned in terms of environmental sustainability, in accordance with the EU Taxonomy classification and criteria.

This classification system, which is a cornerstone of the European Green Deal, and is also referred to as the EU taxonomy for sustainable activities or the Green taxonomy, lists economic activities that qualify as sustainable, based on scientific, ambitious and transparent criteria, in line with the EU's environmental objectives, including the carbon neutrality objective and the Paris Agreement.

An activity qualifies as sustainable if it pursues one of the following six environmental objectives: climate change mitigation, climate change adaptation, the sustainable use and protection of water and marine resources, the transition to a circular economy, pollution prevention and control, and the protection and restoration of biodiversity and ecosystems. The activity must meet the following three criteria:

- It must be set out in the delegated regulations and meet technical screening criteria;
- It must not cause significant harm to any of the other five objectives;
- It must be carried out in compliance with minimum safeguards.

The Group referred to the Delegated Regulations⁽¹⁾ to ascertain which of its activities were covered by the EU Taxonomy nomenclature. To date, these regulations have defined which activities qualify as eligible and aligned based only on the two climate change objectives (climate change mitigation and climate change adaptation) and established the technical screening criteria for determining the conditions under which an activity qualifies as contributing substantially to one or other of these two objectives and for

determining whether that activity causes no significant harm to any of the five other environmental objectives.

The CSR department and the finance department performed this assessment to ascertain whether FDJ's activities qualified as eligible and aligned. To do this, they relied on a methodological approach that involved analysing the Group's revenue, capital expenditure and operating expenditure.

FDJ Group is in compliance with the minimum safeguards provided for in the green taxonomy. It is fully committed to upholding Human Rights and Fundamental Principles and Rights at Work as laid out in the guiding principles of the OECD, the UN and the ILO. (see section 7 Integrity).

12.1.1 PROPORTION OF TAXONOMY-ALIGNED REVENUE

Activities that qualify as aligned based on the climate change mitigation and climate change adaptation objectives are defined in Annexes I and II of the Climate Delegated Act ⁽²⁾ and are identified as contributing substantially to climate change mitigation where they help to stabilise greenhouse gas concentration values in the atmosphere, avoid producing greenhouse gas emissions, reduce such emissions or improve their removal.

An activity is said to be "Taxonomy-eligible" where it meets the description of one of the activities referred to in Annexes I and II of the Climate Delegated Act.

FDJ Group's activities fall into three sectors of activity:

- Lottery;
- Sports betting and online gaming open to competition;
- Adjacent activities (international services, payment & services and entertainment).

FDJ's lottery and sports betting activities are not "Taxonomy-eligible" as they are not included in the creative, arts and entertainment activities listed in section 13.1 of Annex II. The adjacent activities could be potentially eligible, as they are included in the computer programming, consultancy and related activities referred to in section 8.2 of Annex II. However, since the activities referred to in that section do not qualify as "enabling activities"⁽³⁾ based on the technical screening criteria provided for in the Taxonomy, the adjacent activities are not "Taxonomy-eligible" either.

(1) Delegated Regulation (EU) 2021/2139 of 4 June 2021 and its Annexes I and II, Art. 8 Delegated Regulation (EU) 2021/2178 of 6 July 2021.

(2) EU Taxonomy Climate Delegated Act (EU) 2021/2139 of 4 June 2021.

(3) Enabling activity: an economic activity that directly enables other activities to make a substantial contribution to one or more of the objectives by providing products or solutions that can prevent and/or limit the negative effects of climate change on the current or future climate.

Since FDJ Group's activities are not Taxonomy-eligible, the proportion of "eligible" revenue is nil. The notion of revenue corresponds to the definition applied in the Group's consolidated financial statements under IFRS.

Economic activities (1)	Codes (2)	Absolute revenue €m (3)	Share of revenue (4)	Substantial contribution criteria						Significant harm criteria						Minimum safeguards (17)	Proportion of Taxonomy - aligned revenue, Curr. year (18)	Proportion of Taxonomy - aligned revenue, Prev. year (19)	Category (enabling activity) (20)	Category (transitional activity) (21)	
				Climate change mitigation (5)	Climate change adaptation (6)	Water and marine resources (7)	Circular economy (8)	Pollution (9)	Biodiversity and ecosystems (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water and marine resources (13)	Circular economy (14)	Pollution (15)	Biodiversity and ecosystems (16)						
		Currency	%	%	%	%	%	%	%	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Percentage	Percentage	H	T	
A. TAXONOMY-ELIGIBLE ACTIVITIES		0	0.0%																		
A.1 Environmentally sustainable economic activities (Taxonomy-aligned)																					
Revenue from environmentally sustainable activities (Taxonomy-aligned) (A.1)		0	0.0%	0%	0%	%	%	%	%								%				
A.2 Activities that are Taxonomy-eligible but do not have a significant impact on environmental sustainability (not Taxonomy-aligned)																					
Revenue from activities that are Taxonomy-eligible but do not have a significant impact on environmental sustainability (not Taxonomy-aligned) (A.2)		0	0.0%																		
TOTAL (A.1 + A.2)		0	0.0%														%		%		
B. ACTIVITIES THAT ARE NOT TAXONOMY-ELIGIBLE																					
Revenue from activities that are not Taxonomy-eligible (B)		2,461.1	100.0%																		
Total (A + B)		2,461.1	100.0%																		

N/A: not applicable.

12.1.2 PROPORTION OF TAXONOMY-ELIGIBLE CAPITAL EXPENDITURE (CAPEX)

According to the Taxonomy, CAPEX ⁽¹⁾ corresponds to the increase in the gross value of property, plant and equipment and intangible assets during the financial year as presented in the consolidated financial statements. In 2022, the Group's main CAPEX items related to developments of production and back-office information systems, point-of-sale terminals and items of point-of-sale furniture.

"Eligible" CAPEX covers capital expenditure:

- relating to assets or processes associated with Taxonomy-eligible economic activities for which eligible revenue has been identified;

- that is part of a plan to expand Taxonomy-eligible activities or to enable eligible activities to become sustainable;
- relating to "individual measures" corresponding to activities listed in the delegated regulations but which do not produce revenue.

"Aligned" CAPEX covers eligible CAPEX that satisfies the following criteria:

- it must meet the technical screening criteria set out in the delegated regulations;
- it must not cause significant harm to any of the other five objectives;
- it must be carried out in compliance with minimum safeguards.

(1) CAPEX covers property, plant and equipment (IAS 16), intangible assets (IAS 38) and leases (IFRS 16).

Group CAPEX for the year ended 31 December 2022 amounted to €105 million, of which €61 million in expenditure on intangible assets, primarily the development of production and back-office IT systems, and €44 million in expenditure on property, plant and equipment, chiefly gaming terminals and items of point of sale furniture. It also includes property leases.

Given the nature of the Group's CAPEX, only a very small portion is Taxonomy-eligible, i.e. 8.3% of Group CAPEX made up of capital expenditure relating to individual measures. This CAPEX to property leases in the amount of €8.4 million, the installation of electric vehicle powering stations across all the FDJ sites in the amount of €0.2 million and the installation of renewable energy technologies in the amount of €0.1 million.

The property leases entered into in 2022 do not currently satisfy all of the alignment criteria. Taxonomy-aligned CAPEX accounts for 0.3% of Group CAPEX [3.9% of Group Taxonomy-eligible CAPEX].

Economic activities (1)	Codes (2)	CAPEX (absolute value) €m (3)	Proportion of CapEx (4)	Substantial contribution criteria						Significant harm criteria						Minimum safeguards (17)	Proportion of Taxonomy-aligned CAPEX, Curr. year (18)	Proportion of Taxonomy-aligned CAPEX, Prev. year (19)	Category (enabling activity) (20)	Category (transitional activity) (21)							
				Climate change mitigation (5)	Climate change adaptation (6)	Water and marine resources (7)	Circular economy (8)	Pollution (9)	Biodiversity and ecosystems (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water and marine resources (13)	Circular economy (14)	Pollution (15)	Biodiversity and ecosystems (16)												
		Currency	%	%	%	%	%	%	%	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Percentage	Percentage	H	T							
A. TAXONOMY-ELIGIBLE ACTIVITIES		8,8	8,3%																								
A.1 Environmentally sustainable economic activities (Taxonomy-aligned)																											
Installation of electric vehicle powering stations	7.4	0.2	0.2%	100%	0%	%	%	%	%	YES	YES	YES	YES	YES	YES	YES	0.2%	N/A	N								
Installation, maintenance and repair of renewable energy technologies	7.6	0.1	0.1%	100%	0%					YES	YES	YES	YES	YES	YES	YES	0.1%	N/A									
CAPEX from environmentally sustainable activities (Taxonomy-aligned) (A.1)		0.3	0.3%	100%	%	%	%	%	%								0.3%	N/A									
A.2 Activities that are Taxonomy-eligible but do not have a significant impact on environmental sustainability (not Taxonomy-aligned)																											
Acquisition and ownership of buildings	7.7	8.4	8.0%																								
CAPEX from activities that are Taxonomy-eligible but do not have a significant impact on environmental sustainability (not Taxonomy-aligned) (A.2)		8.4	8.0%																								
TOTAL (A.1 + A.2)		8.8	8.3%																								
B. ACTIVITIES THAT ARE NOT TAXONOMY-ELIGIBLE																											
CAPEX from activities that are not Taxonomy-eligible (B)		96.4	91.7%																								
Total (A + B)		105.2	100.0%																								

N/A: not applicable.

(*) May not apply according to the delegated act.

12.1.3 PROPORTION OF TAXONOMY-ELIGIBLE AND TAXONOMY-ALIGNED OPERATING EXPENDITURE (OPEX)

According to the Taxonomy, the denominator in operating expenditure (OPEX) corresponds to non-capitalised direct costs relating to research and development, the renovation of buildings, short-term leases, maintenance and repair costs and direct expenses relating to the routine maintenance of property, plant and equipment by the Company or by a third

party to whom these tasks have been outsourced. The Group does not consider these expenses (€107 million) to be material in relation to total operating expenditure (€2,001 million) and does not calculate a ratio, pursuant to the exemption provided for in the green taxonomy.

Economic activities (1)	Codes (2)	OPEX (absolute value) €m (3)	Share of revenue (4)	Substantial contribution criteria						Significant harm criteria						Minimum safeguards (17)	Proportion of Taxonomy-aligned OPEX, Curr. year (18)	Proportion of Taxonomy-aligned OPEX, Prev. year (19)	Category (enabling activity) (20)	Category (transitional activity) (21)
				Climate change mitigation (5)	Climate change adaptation (6)	Water and marine resources (7)	Circular economy (8)	Pollution (9)	Biodiversity and ecosystems (10)	Climate change mitigation (11)	Climate change adaptation (12)	Water and marine resources (13)	Circular economy (14)	Pollution (15)	Biodiversity and ecosystems (16)					
		Currency	%	%	%	%	%	%	%	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Y/N	Percentage	Percentage	H	T
A. TAXONOMY-ELIGIBLE ACTIVITIES		0.0	0.0%																	
A.1 Environmentally sustainable economic activities (Taxonomy-aligned)																				
OPEX from environmentally sustainable activities (Taxonomy-aligned) (A.1)			0.0%	%	%	%	%	%	%								0.0%	N/A		
A.2 Activities that are Taxonomy-eligible but do not have a significant impact on environmental sustainability (not Taxonomy-aligned)																				
OPEX from activities that are Taxonomy-eligible but do not have a significant impact on environmental sustainability (not Taxonomy-aligned) (A.2)		0.0	0.0%																	
TOTAL (A.1 + A.2)		0.0	0.0%														0.0%	N/A	%	
B. ACTIVITIES THAT ARE NOT TAXONOMY-ELIGIBLE																				
OPEX from activities that are not Taxonomy-eligible (B)		106.5	100.0%																	
Total (A + B)		106.5	100.0%																	

N/A: not applicable.

13. Notes: additional monitoring indicators

Indicators	Scope	2021	2022
Fuel oil consumption during the year	Boulogne-Billancourt (Delta, Aguesseau), Saint-Mard, Saint-Witz, Villepinte and Vitrolles sites	0 litre	0 litre
Fuel oil is used by power generators			
Gas consumption during the year	FDP agencies and Saint-Mard site	2,155,085 kWh	1,216,157 kWh
Electricity consumption during the year	FDP agencies, Boulogne-Billancourt (Delta, Aguesseau), Saint-Mard, Saint-Witz, Villepinte and Vitrolles sites	18,904,467 kWh	19,324,046 kWh
Water consumption during the year	Vitrolles, Villepinte, Saint-Witz, Saint-Mard, Boulogne-Billancourt (Delta and Aguesseau) sites	14,965 m ³	14,627 m ³
Renewable electricity consumption	FDP agencies, Vitrolles, Villepinte, Saint-Witz, Saint-Mard, Boulogne-Billancourt (Delta and Aguesseau) sites	100%	100%
Share of waste recycled	Vitrolles, Villepinte, Saint-Witz, Saint-Mard, Boulogne-Billancourt (Delta and Aguesseau) sites	74%	83%
The rate of recycled waste breaks down as follows: reuse: 0.2%, recycling: 81%, composting: 2%			
Proportion of Taxonomy-eligible (2021) and Taxonomy-aligned (2022) revenue	FDJ Group	0 (eligible)	0 (aligned)
Proportion of Taxonomy-eligible (2021) and Taxonomy-aligned (2022) CAPEX	FDJ Group	≈ 10% (eligible)	0.3% (aligned)
Proportion of Taxonomy-eligible (2021) and Taxonomy-aligned (2022) OPEX	FDJ Group	1.3 (eligible)	n/a
Number of deadly accidents	FDJ	0	0
Percentage of revenue from orders for promotional items manufactured by factories located in high-risk countries and certified SA 8000 or subject to a social audit	FDJ	86%	100%
Percentage of UCITS investments in SRI funds	FDJ	23.4%	36.7%
<p>The sharp increase in the ratio was attributable to two main factors:</p> <ul style="list-style-type: none"> – the classification of one of our dedicated funds as an Article 8 fund (under the SFDR) for an amount of approximately €100 million; – the rise in interest rates, which enabled us to return to SRI money market funds. 			

Indicators	Scope	2021	2022
Percentage of women on the Board of Directors at 31 December	FDJ	50%	50%
At 31 December 2022, half of the seats on FDJ's Board of Directors were held by women (excluding directors representing employees and employee shareholders), i.e. 6 women out of a total of 12 directors.			
Female representation on the Group Management Committee at 31 December		38%	39%
9 of the 23 members of the Group Management Committee were women at 31 December.			
Percentage of independent directors at 31 December		50%	50%
The independent directors are: Ms. Dulac, Mr. Girre, Ms. Lejbowicz, Mr. Pringuet, Predica (represented by Ms. Barjou) and Ms. Gri. This percentage does not include the directors representing the employees and employee shareholders.			
Attendance rate at Board of Directors meetings	FDJ	92%	92%
The attendance rate was calculated by averaging the attendance rate of each member of the Board of Directors over the year.			
Employee shareholders	FDJ Group	3.8%	3.8%
Percentage of employees covered by a collective bargaining agreement	FDJ	100%	100%
Organisation of working hours	FDJ Group		

In 2021, most FDJ Group employees worked full days. Most of the Group's subsidiaries are covered in France by a branch agreement on working hours, and often also a company agreement on the same subject matter (FDJ, FDP, FDJ Gaming Solutions France and FDI).

Working time conventions stipulate either that working time be calculated over 35 hours, or that annualised conventions be introduced. Employees also have a certain number of reduction of working time ("RTT") days, over and above the legal and contractual days of paid holiday and any other days of leave relating to long service.

An additional clause on the development of remote working was renegotiated in 2022, amending the initial agreement entered into in 2019, and providing for the possibility of employees being able to work remotely for up to 100 days a year. This agreement is part of the human resources policy to develop employee engagement and empowerment and is an additional driver to further enhance the appeal of the FDJ employer brand.

The public health crisis has shown that the Group is capable of organising work differently:

- flexibility in the manner in which work is organised through extensive remote working over a long period;

- capacity to react and adapt by maintaining an effective social dialogue of a high standard (health management and support system established on quality of life at work, agreement on donating/requesting days of paid leave, etc.) and further evidence of the solidarity-related values of the Group and its employees.

The current remote working model (agreement and/or practices) already provides for conditions (100 remote working days a year, with two set days or adaptable days and possible exemptions in the event of epidemic-related risks or transport strikes) that bring a new and more efficient on-site / remote working balance. Awareness actions and reminders of the procedures are staged regularly (e-meetings with managers) to ensure that every eligible employee becomes familiar with the remote working options and to help managers embrace the new on-site/remote working arrangements.

Lastly, an amendment to the initial agreement was signed in 2022 introducing specific remote working arrangements for staff at the commercial subsidiary FDP, based on the same principles as the FDJ agreement. Alongside this, the Group is continuing to develop the most suitable remote working practices at its smallest entities.

Remuneration policy

FDJ Group

The remuneration policy is part of the overall policy of the FDJ employee Experience and Transformation department, which is intended to serve the Company's strategy. It is designed to encourage employees to meet the Company's performance targets:

- by valuing contribution;
- by acknowledging performance;
- by encouraging progress; and
- by implementing retention systems to hold onto talent.

The remuneration and employee benefit policies reflect benchmark practices in the markets in which the Group operates, with a constant pursuit of internal fairness and external competitiveness. These policies are based on a mapping of the functions, to define the remuneration principles for each sector business line and level of responsibility and importance of the role. This also enables

internal analyses and makes it possible to compare the Group's practices each year with those of the market via updated remuneration surveys.

The starting salaries of new employees are compared against a market benchmark and the internal remuneration benchmark. Salaries are then reviewed yearly when the wage policy is being set and during employee reviews.

The rules and principles of the remuneration policy are circulated at least once a year when the wage policy is set, with a specific communication for managers, a communication to all employees and regular updates in the Human Resources section of the internal social network accessible to all. Alongside these communication actions, meetings are held on site or remotely for managers and employees.

Gross payroll expense

in thousands of euros	2021			2022		
	Fixed	Variable	Total	Fixed	Variable	Total
FDJ	145,391	32,849	178,240	158,820	36,947	195,766
FDJ Group ⁽¹⁾	219,090	45,714	264,804	233,593	49,220	282,813

(1) Data presented for the Group, excluding the new entities acquired in 2022 (L'Addition and Aleda). Payroll expense includes employee profit-sharing and excludes long-term benefits and other personnel expenses contained in the notes to the consolidated financial statements.

A reminder of the overall performance evaluation of each employee is included in each manager's wage policy decision tables, to ensure that these decisions are consistent with the performance evaluation. The positioning of the

employee's remuneration in relation to the Company's benchmarks is also taken into account.

Changes in the average monthly remuneration and median base

in thousands of euros	2021		2022	
	Average	Median	Average	Median
FDJ	4.46	4.06	4.53	4.11
FDJ Group	4.29	3.78	3.43	3.89

Furthermore, for the last six years, a variable component system linked to performance has been gradually introduced and revised at FDJ for all management-level staff on permanent contracts, i.e. 80% of employees. Given the activity of FDP and FDJ Gaming Solutions France, all employees already have a variable wage component.

An LTI (long-term incentive) plan has been incorporated into the remuneration system since 2021. LTI plans are in place at nearly 90% of SBF 120 companies, in order to:

- encourage multi-year performance, the creation of value and the application of the strategy by setting unchallengeable, clearly-defined performance targets;
- retain employees who help achieve these objectives through their role, their professional and personal qualities and their commitment to the Group and its *raison d'être*;
- attract the talent that the Group needs to fulfil its ambitions.

Under the long-term incentive plan, employees are allocated performance shares, which will only vest if ambitious and balanced three-year performance targets are met based on financial, operational and CSR criteria.

The beneficiaries of the LTI plan were identified based on a dedicated staff review, integrated into the Group's talent management system. This new system is an integral part of the performance policy introduced by FDJ.

A total of 118 employees, i.e. nearly 4% of the Group's workforce (median of around 1.8% at other SBF 80 companies) benefited from the plan in 2022.

The remuneration also includes employee profit-sharing and incentives, which are designed to share the results of performance and sustain employee engagement. New Group-level profit-sharing and incentive agreements were signed in 2021 (see section 7.1.7.1 Employee incentive and profit-sharing agreements of the Universal Registration Document 2022.). The Company may make an additional contribution to incentive amounts, pursuant to the various agreements signed by the Group entities (see section 7.1.7.2 Employee savings schemes and employee shareholding policy of the Universal Registration Document 2022).

Number of new hires on permanent and fixed-term contracts

	2021	2022			
		Permanent		Fixed-term	
		M	F	M	F
FDJ	157	144	72	42	42
FDJ Group	301	274	122	62	70
		396		132	

Number of departures during the year

		Resig- nation	Dismissal on economic grounds	Dismissal for other reasons	Departure during trial period	Mandatory retirement/ Retirement	Death	Contractual termination	Subsi- diaries transfer	Suspended contracts	Expiration of contract (incl. temp. summer)	Total excl. expira- tion of contracts
2021	FDJ	14	-	25	9	12	1	7	6	4	47	78
	FDJ Group	101	9	52	16	12	1	11	13	6	59	221
2022	FDJ	25	0	27	4	11	1	7	0	7	43	82
	FDJ Group	103	0	50	11	12	2	11	77	7	66	339

Trade union representation

FDJ	FO	57.52%
	CFE-CGC	37.30%
	UNSA	5.18%
FDJ Group	FO	47.18%
	CFE-CGC	34.35%
	CFDT	15.00%
	UNSA	3.47%

14. Report by one of the statutory auditors, appointed as an independent third party, on the consolidated non-financial information statement

For the year ended December 31, 2022

This is a free English translation of the report by one of the Statutory Auditors issued in French and is provided solely for the convenience of English-speaking readers. This report should be read in conjunction with, and construed in accordance with, French law and professional standards applicable in France.

To the Shareholders,

In our capacity as Statutory Auditor of the company La Française des Jeux (hereinafter the "Entity"), appointed as independent third party ("third party") and accredited by the French Accreditation Committee (Cofrac), (Cofrac Inspection Accreditation, n°3-1862, scope available at www.cofrac.fr), we have undertaken a limited assurance engagement on the historical information (observed or extrapolated) in the consolidated non-financial statement, prepared in accordance with the Entity's procedures (hereinafter the "Guidelines"), for the year ended December 31, 2022 (hereinafter the "Information" and the "Statement", respectively), presented in the group management report pursuant to the legal and regulatory provisions of Articles L. 225-102-1, R. 225-105 and R. 225-105-1 of the French Commercial Code (code de commerce).

CONCLUSION

Based on the procedures we have performed as described under the "Nature and scope of procedures" and the evidence we have obtained, nothing has come to our attention that cause us to believe that the consolidated non-financial statement is not prepared in accordance with the applicable regulatory provisions and that the Information, taken as a whole, is not presented fairly in accordance with the Guidelines.

PREPARATION OF THE NON-FINANCIAL PERFORMANCE STATEMENT

The absence of a commonly used generally accepted reporting framework or a significant body of established practice on which to draw to evaluate and measure the Information allows for different, but acceptable, measurement techniques that can affect comparability between entities and over time.

Consequently, the Information needs to be read and understood together with the Guidelines, summarised on the website of the entity.

INHERENT LIMITATIONS IN PREPARING THE INFORMATION

As stated in the Statement, the Information may be subject to uncertainty inherent to the state of scientific and economic knowledge and the quality of external data used. Some information is sensitive to the choice of methodology and the assumptions or estimates used for its preparation and presented in the Statement.

RESPONSIBILITY OF THE ENTITY

Management of La Française des Jeux is responsible for:

- selecting or establishing suitable criteria for preparing the Information;

- preparing a Statement pursuant to legal and regulatory provisions, including a presentation of the business model, a description of the main non-financial risks, a presentation of the policies implemented considering those risks and the outcomes of said policies, including key performance indicators and the information set-out in Article 8 of Regulation (EU) 2020/852 (Green taxonomy);
- preparing the Statement by applying the Entity's "Guidelines" as referred above; and
- implementing internal control over information relevant to the preparation of the Information that is free from material misstatement, whether due to fraud or error.

The Statement has been prepared by Management board.

RESPONSIBILITY OF THE STATUTORY AUDITOR APPOINTED AS INDEPENDENT THIRD PARTY

Based on our work, our responsibility is to express a limited assurance conclusion on:

- the compliance of the Statement with the requirements of Article R. 225-105 of the French Commercial Code;
- the fairness of the information provided pursuant to part 3 of sections I and II of Article R. 225-105 of the French Commercial Code, i.e. the outcomes of policies, including key performance indicators, and measures relating to the main risks, hereinafter the "Information."

As we are engaged to form an independent conclusion on the Information as prepared by management, we are not permitted to be involved in the preparation of the Information as doing so may compromise our independence.

It is not our responsibility to report on:

- the Entity's compliance with other applicable legal and regulatory provisions (particularly with regard to the information set-out in Article 8 of Regulation (EU) 2020/852 (Green taxonomy), the French duty of care law and against corruption and tax evasion);
- the fairness of information set-out in Article 8 of Regulation (EU) 2020/852 (Green taxonomy)
- the compliance of products and services with the applicable regulations.

APPLICABLE REGULATORY PROVISIONS AND PROFESSIONAL GUIDANCE

We performed the work described below in accordance with Articles A. 225-1 et seq. of the French Commercial Code, the professional guidance issued by the French Institute of Statutory Auditors (Compagnie Nationale des Commissaires aux Comptes) applicable to such engagement, in particular the professional guidance issued by the Compagnie Nationale des Commissaires aux Comptes, Intervention du commissaire aux comptes – Intervention de l'OTI – déclaration de performance extra-financière, and acting

as the verification programme and with the international standard ISAE 3000 (revised) - Assurance engagements other than audits or reviews of historical financial information.

INDEPENDENCE AND QUALITY CONTROL

Our independence is defined by the provisions of Article L. 822-11 of the French Commercial Code and French Code of Ethics for Statutory Auditors (Code de déontologie) of our profession. In addition, we have implemented a system of quality control including documented policies and procedures aimed at ensuring compliance with applicable legal and regulatory requirements, ethical requirements and the professional guidance issued by the French Institute of Statutory Auditors (*Compagnie Nationale des Commissaires aux Comptes*) relating to this engagement.

MEANS AND RESOURCES

Our work engaged the skills of 5 people between September 2022 and February 2023 and took a total of 5 weeks.

We were assisted in our work by our specialists in sustainable development and corporate social responsibility. We conducted 21 interviews with people responsible for preparing the Statement, representing in particular CSR direction, risk management, compliance, human resources, health and safety, environmental, procurement, and M. Maximilien Faivre, CSR and sustainability consultant.

NATURE AND SCOPE OF PROCEDURES

We are required to plan and perform our work to address the areas where we have identified that a material misstatement of the Information is likely to arise.

The procedures we performed were based on our professional judgment. In carrying out our limited assurance engagement on the Information, we:

- obtained an understanding of all the consolidated entities' activities and the description of the main risks associated;
- assessed the suitability of the criteria of the Guidelines with respect to their relevance, completeness, reliability, neutrality and understandability, taking into account, where appropriate, best practices within the sector;
- verified that the Statement includes each category of social and environmental information set out in article L. 225 102 1 III as well as information regarding compliance with human rights and anti corruption and tax avoidance legislation;
- verified that the Statement provides the information required under Article R.225-105 II of the French Commercial Code where relevant with respect to the main risks, and includes, where applicable, an explanation for the absence of the information required under

Article L.225-102-1 III, paragraph 2 of the French Commercial Code;

- verified that the Statement presents the business model and a description of the main risks associated with of all the consolidated entities' activities, including where relevant and proportionate, the risks associated with its business relationships, its products or services, as well as its policies, measures and the outcomes thereof, including key performance indicators associated to the main risks;
- referred to documentary sources and conducted interviews to:
 - assess the process used to identify and confirm the main risks as well as the consistency of the outcomes, including the key performance indicators used, with respect to the main risks and the policies presented, and
 - corroborate the qualitative information (measures and outcomes) that we considered to be the most important presented in Appendix 1. Our work was carried out on the consolidating entity la Française des Jeux;
- verified that the Statement covers the consolidated scope, i.e. all the entities within the consolidation scope in accordance with Article L. 233-16 of the French Commercial Code within the limitations set out in the Statement;
- obtained an understanding of internal control and risk management procedures the Entity has implemented and assessed the data collection process aimed at ensuring the completeness and fairness of the Information;
- for the key performance indicators and other quantitative outcomes that we considered to be the most important presented in Appendix, implemented:
 - analytical procedures to verify the proper consolidation of the data collected and the consistency of any changes in those data;
 - tests of details, using sampling techniques, in order to verify the proper application of definitions and procedures and reconcile the data with supporting documents. This work was carried out on a selection of contributing entities, la Française des Jeux SA et FDP, and covers between 40% and 100% of the consolidated data relating to the key performance indicators and outcomes selected for these tests;
- assessed the overall consistency of the Statement in relation to our knowledge of all the consolidated entities

The procedures performed in a limited assurance review are less in extent than for a reasonable assurance opinion in accordance with the professional guidelines of the French National Institute of Statutory Auditors (*Compagnie Nationale des Commissaires aux Comptes*); a higher level of assurance would have required us to carry out more extensive procedures.

Neuilly-sur-Seine, 16 February, 2023

One of the Statutory Auditors,

PricewaterhouseCoopers Audit

Jean-Paul Collignon
Partner

Aurélien Castellino-Cornetto
Sustainable Development Director

ANNEX: LIST OF INFORMATION WE CONSIDERED MOST IMPORTANT**● Key performance indicators and other quantitative results:**

- Overall compliance with responsible gaming and security criteria
- Compliance rate for underage gambling testing
- Share of advertising budget devoted to responsible gambling (all media)
- Player distribution according to the Canadian Problem Gambling Index
- Distribution of online lottery and sports betting players as assessed by Playscan
- Amounts paid in the framework of responsible gaming partnerships
- Number of reports processed related to vulnerable gambling situations in 2022
- Number of vulnerabilities managed in 2022
- Fraud rate (non-payments) on remote debit card payments
- Number of suspicious transactions reports to Tracfin
- Number and share of employees trained in GDPR
- Number of alerts transmitted to the national platform
- Number of sports players made aware of the increasing risks of manipulation of sports competitions and the good reflexes to have
- Number and share of employees having completed Ethics and anti-corruption training
- Effective tax rate
- Amount of tax expense
- Share of strategically important and major suppliers assessed based on CSR performance
- Average payment times
- Share of invoices settled late
- Amount of group purchases from ESATs and EAs
- Percentage of FDJ suppliers located in city policy districts
- Number of agreements signed during the year
- Number of employees at 31/12 of the financial year (FDJ SA and FDJ Group)
- Percentage of women among employees on fixed-term and permanent contracts at 31/12 of the financial year (Group and Group Executive Management)
- Share of women among managers for FDJ SA and in the Group
- Direct employment rate of persons with disabilities (FDJ SA and FDJ Group)
- Number and percentage of work-study trainees within FDJ SA and FDJ Group
- Response rate of FDJ SA employees to the Diversity and Inclusion barometer
- Total number of training hours
- Number of employees trained during the year
- Percentage of employees who completed training during the year
- Percentage of payroll expenditure devoted to training
- Absenteeism rate
- Workplace accident frequency rate
- Workplace accident severity rate
- Average well-being at work score given by employees
- Engagement rate of employees
- Employee response rate to the 2022 edition of the FDJTeam
- Amount of contributions to causes of general interest
- Amount of financial aid granted by the FDJ Corporate Foundation
- Number of CSOs belonging to the social laboratory
- Attendance rate of CSO members during Social Laboratory sessions
- Number of sessions of the social laboratory
- FDJ's contribution to French GDP
- Number of jobs created or made permanent by FDJ's activity
- Number of jobs created or made permanent by FDJ in the bartobacco-press sector
- Share of purchases made from suppliers located in France
- Share of French purchases made from SMEs and ISEs
- Total scope 1 and scope 2 carbon emissions evolution (vs. 2017)
- Total number of active French suppliers
- Share of electric cars in the Group's fleet of company cars
- Share of paper from FSC-certified responsible sources used for the manufacture of gaming materials.

● **Qualitative information (actions and results) :**

- Deployment of new preventive communication media with partner distributors
- Reinforcement of commitment to preventive communication, via numerous television campaigns dedicated to responsible gaming
- Distribution of a new responsible gaming brochure to partner distributors, aimed at players
- Optimization of the visibility of responsible gaming systems on the "fdj.fr" website, by highlighting the advice and services offered to players
- Design and deployment of a specific responsible gaming action plan ahead of the Football World Cup
- FDJ has secured access to player accounts and assets using its multi-factor authentication (MFA) system
- Reinforcement of the LCB-FT internal control system through the deployment of the second-level permanent control plan and the development of a new reference system serving the self-assessment process of the system by operational managers
- Proposal to employees to participate in online surveys lasting approximately forty minutes as part of an innovative awareness campaign
- FDJ continued its financial and human contribution following the KCOOS+ (Keep crime out of sport +) project of the Council of Europe, by supporting the new project called ACT (Addressing Competition manipulation Together) planned for 3 years
- Continuation of training and updating of the practical guide to competition to include elements related to abuse of collective dominant position
- Notification to the Competition Authority of its proposed acquisition of ALEDA, a supplier of point-of-sale checkout solutions
- All buyers trained in the overall cost of ownership ("Total Cost of Ownership") and the integration of social and environmental externalities, during the financial evaluation of offers during calls for tenders
- For the FDP commercial subsidiary: continued professionalization of the sales force and support for commercial transformation, particularly in prospecting and performance management
- At the end of 2022, negotiations continued, still at Group level, regarding the Mutual and Welfare system, with the aim of harmonizing the systems within all Group companies
- At the same time, negotiations have been opened concerning the management of jobs and professional careers (GEPP), and will probably continue in 2023
- Training plan dedicated to Diversity, the fight against discrimination and harassment, validated and which will be provided over 3 years to the actors of diversity
- E-learning training module in progress, with the support of our partner Mozaïk RH
- Holistic individualized support program set up: two three-month promotions allowed participants to follow a dedicated program
- FDJ group employees interviewed via the FDJTeam internal climate barometer
- Patronage strategy, also in line with the company's raison d'être, which revolves around 3 main axes: responsible gaming, equal opportunities and territorial anchoring
- Quarterly newsletter set up to communicate on the company's major highlights to our various dialogue bodies
- Renewal of the Rebond fund in 2022
- Raising the awareness of the members of the Management Committee, including the Chairman and Chief Executive Officer and the Deputy Chief Executive Officer, of the issues related to climate change and the loss of biodiversity during a special committee dedicated to environmental issues
- Project in collaboration with FSC France, WWF France and CDC Biodiversité to integrate the requirements of the FSC label into the GBS tool and study which showed that FSC-certified wood leads to greater remaining biodiversity per unit area than wood not certified in the forest
- Donation of 200,000 euros to the "ONF – Agir pour la Forêt" fund managed by the Office National des Forêts.



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