

Code of Business Conduct and Ethics



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Message from the CEO and the Chairman of the Board

Dear Colleagues,

Sportradar Group AG and its subsidiaries (the “Company” or “Sportradar”), and all of its employees, officers and directors are deeply committed to upholding ethical standards. As Sportradar grows as the world’s leading sports technology company, we are committed to serving our clients, our partners and our shareholders with the highest degree of integrity. Our commitment to ethical conduct is fundamental to maintaining our unique position within the sports business ecosystem.

We place integrity, transparency and professionalism at the heart of all we do. In order to maintain the respect and trust of our stakeholders including our employees, and to drive Sportradar’s ongoing success, it is crucial we conduct our business in a manner that upholds our high standards of ethics and integrity. This means more than just complying with laws and regulations - it means leading by example in both our business practices and personal conduct. It is expected that you carefully read and abide by what is set forth as the Sportradar Code of Business Conduct and Ethics (the “Code”) and the policies that support it. This Code sets out the standards of behavior by which we are all bound.

While the Code cannot detail the specific behavior required in every situation, it can and does serve as an ethical guide by which our behavior can be guided.

Compliance with the Code is everyone’s business, and it is incumbent on all of us to review the Code, to understand the Code and to abide by the Code. Ethical conduct is not optional.

Thank you for your cooperation and working together to ensure Sportradar continues to be a brand worthy of trust.

Carsten Koerl
CEO
Sportradar Group AG

Jeff Yabuki
Chairman of the Board
Sportradar Group AG

I. Overview

1. Scope and Worldwide Application

This Code codifies our expectations for business conduct by providing the ethical and behavioral framework for making sound decisions in compliance with applicable laws and regulations that govern our business and represents our commitment to doing the right thing. The Board of Directors (the “Board”) has adopted this Code to protect our reputation while enhancing and maintaining confidence in the Sportradar brand and driving shareholder value, and to support Sportradar’s commitment to conducting business in a manner that gives due consideration to the environment, to ensure Sportradar is socially responsible, and to promote policies and practices that ensure appropriate oversight and compliance with applicable laws. Additionally, the Board has adopted this Code to encourage:

- Honest and ethical conduct, including fair dealing and the ethical handling of actual or apparent conflicts of interest;
- Full, fair, accurate, timely and understandable disclosure;
- Compliance with applicable laws, rules and regulations;
- Prompt internal reporting and investigations of all reports of actual or suspected violations of laws or the Code;
- Accountability for adherence to the Code, including a fair process by which to determine violations;
- Consistent enforcement of the Code, including clear and objective standards for compliance;
- Zero tolerance for retaliation against individuals who report in good faith perceived or actual violations of the Code behavior;
- The protection of Sportradar’s business interests, including its assets and corporate opportunities; and
- Confidentiality of information entrusted to directors, officers and employees by Sportradar and its clients.

Ultimately, the Code sets out our commitment to each other, our clients and our shareholders, and explains our responsibility, individually and collectively, for compliance within a professional environment.

The Code applies to all officers, directors and employees of Sportradar, its subsidiaries and affiliates, worldwide. All employees of Sportradar are obliged to adhere to and comply with this Code. Consultants and contractors engaged by Sportradar are also required to abide by the policies, principles and values set out in this Code when performing services for, or on behalf of, Sportradar.

The Code applies in all countries where Sportradar conducts business, whether or not Sportradar has a physical presence in the country (such as an office). As a global business, we operate in a complex network of law, regulation and policy. The Code may be amended periodically to reflect changes in legal, regulatory or business requirements, including with respect to specific local

requirements, customs or best practices. In the event of a conflict between applicable laws or policies and the Code, we will apply the more stringent standard. All material amendments to the Code must be approved by the Board.

In this Code, we refer to our principal executive officer, principal financial officer, principal accounting officer and controller, or persons performing similar functions, as our “principal financial officers.” This Code, as applied to the Company’s principal financial officers, will be our “code of ethics” within the meaning of Section 406 of the Sarbanes-Oxley Act of 2002 and the rules promulgated thereunder.

2. Seeking Help and Asking Questions

All employees are responsible for the prevention, detection and reporting of any illegal, questionable or suspicious activity within Sportradar.

Each one of us has a responsibility:

- To read, understand and adhere to the Code;
- To lead by example by applying the Code in our day-to-day activities and conveying its standards in our dealings with those who work with and for us;
- To comply with all applicable laws and regulations;
- To ensure we have access to and receive training on ethical issues and policies relating to the Code;
- To ask questions when unsure of appropriate behavior;
- To promote an environment where we all feel confident and able to speak up about ethical concerns without the fear of ramifications and that our concerns are taken seriously and followed-up; and
- To report behavior that constitutes an actual or perceived violation of the Code.

Additional emphasis is placed upon managers at all levels who are entrusted to ensure that their direct reports receive appropriate ethical guidance and support where required.

Our aim is to encourage openness and we will support anyone who raises genuine concerns in good faith or asks questions under the Code regardless of your position within or your engagement with the Company.

Should you have any questions in relation to the Code, please contact the Chief Legal Officer, the SVP, Global Head of Ethics and Compliance or the Compliance Team via: compliance@sportradar.com

All Sportradar’s policies are available under: [Global Policies](#).

When considering if you are doing the right thing in any situation, ask yourself:

- Is it legal?
- Is it ethical?
- Does it comply with Sportradar's policies?
- Would you be happy telling a family member or close friend about it?

When a concern is raised in good faith, we will investigate it. We are committed to ensuring no one suffers any detrimental treatment including dismissal, disciplinary action, threats or other unfavorable treatment for seeking guidance or raising a genuine concern. If you believe that you have suffered any such treatment, you should inform the Global Head of Ethics and Compliance or the Chief Legal Officer immediately.

If asked to participate in an investigation, your cooperation is required. Failure to cooperate in good faith in an investigation may result in discipline, up to and including termination of employment.

3. Reporting, Accountability and Enforcement

We promote ethical behavior at all times and encourage you to talk to supervisors, managers and other appropriate personnel, including the Global Head of Ethics and Compliance or the Chief Legal Officer, when in doubt about the best course of action to take in a particular situation.

All suspected violations of any sections of this Code and any suspected unethical conduct must be reported as prescribed herein.

You must promptly report known or suspected violations of laws, rules, regulations or the Code or any other unethical behavior by any director, officer, employee or anyone engaged with Sportradar or purporting to be acting on Sportradar's behalf on the [FairPlay Line](#) website, which is available 24 hours a day, 7 days a week. Reports may be made anonymously via the FairPlay Line.

You may also report such violations to:

- your Line Manager;
- your People Team representative or;
- the Chief Legal Officer.

Further, any individual who receives such a report shall promptly report it to the Fair Play Line.

Complaints about accounting, internal accounting controls, auditing matters or questionable financial practices (the "Accounting Complaints") can also be made orally or in writing to the

members of the Audit Committee, as prescribed by Sportradar's [Policies and Procedures for Complaints Regarding Accounting, Internal Accounting Controls, Fraud or Auditing Matters](#).

All information from the FairPlay Line will be provided to the SVP, Global Head of Ethics and Compliance or designee and the People & Places Group Counsel, and, ultimately, the Chief Legal Officer or designee, who shall review the report, and may investigate it themselves or may assign another employee, outside counsel, advisor, expert or third-party service provider to investigate or assist in investigating. Accounting Complaints shall be treated in the manner prescribed in Sportradar's Policies and Procedures for Complaints Regarding Accounting, Internal Accounting Controls, Fraud or Auditing Matters.

Sportradar prohibits retaliation for reports made in good faith. Retaliation or retribution against anyone for a report made in good faith of any suspected violation of laws, rules, regulations or this Code is cause for appropriate disciplinary action, including termination of employment.

For the avoidance of doubt, a failure to report an actual or a suspected violation of this Code is itself deemed a violation under this Code and may lead to disciplinary action.

Further explanations about the FairPlay and how to submit a concern can be found at the links below:

[FairPlay Line](#)

[Global Whistleblowing Policy](#)

4. Waivers

Before a director, executive officer or other principal financial officer, or an immediate family member of a director, executive officer or other principal financial officer, engages in any activity that would be otherwise prohibited by the Code, he or she must obtain a written waiver from the disinterested directors of the Board. Such waiver will be disclosed to the public as required by law or the rules of the Nasdaq Stock Market LLC ("Nasdaq"), when applicable.

II. Our Commitment to our Employees

Our people are the key to Sportradar's success. Your dedication, knowledge and skills determine the quality of our products and services, and thus our market success. We are committed to providing a workplace in which all employees can thrive, as we collectively move the Company forward.

Sportradar is a responsible, reliable and sustainable employer. Respect for each and every employee and their individual circumstances is a core aspect of Sportradar's corporate culture and unlawful conduct will not be tolerated.

1. Human Rights and Fair and Equal Treatment

Every employee, prospective employee, partner, beneficiary, contractor, and supplier of Sportradar has the right to be treated with dignity and respect. Sportradar does not tolerate discrimination and unequal treatment based on gender, ethnic origin, religion or ideology, disability, sexual orientation, political affiliation and age by any Sportradar employee or external partner.

The highest standards of behavior and conduct are expected of all Sportradar employees at all times, regardless of their position or seniority. It is the responsibility of everyone at Sportradar to uphold the principles of this Code and to ensure that individuals are treated fairly.

2. Child and Forced Labor

Sportradar does not tolerate child or forced labor, nor will Sportradar tolerate any working conditions or treatment of employees that violate international agreements, including the UN's Universal Declaration of Human Rights or the standards of the International Labor Organization.

3. Health and Occupational Safety

Sportradar is committed to providing a healthy and safe work environment for all its employees and others who work or visit Sportradar premises around the world. Sportradar subsidiaries and/or offices maintain any required site-specific Health and Safety Policy which considers any unique circumstances, laws and regulations applicable to the site, and to which employees and others who are on the premises must comply.

a. Workplace Safety; Compliance with Health Expectations and Established Protocols

We expect all our employees to perform work in compliance with applicable health and safety laws, regulations, policies and procedures and apply safe work practices at all times in all locations.

Applicable health and safety requirements must be communicated to visitors, including clients and contractors at any Company location.

You are expected to:

- Take reasonable care for your own safety and others around you;
- Immediately report to the [FairPlay Line](#) and your People Team representative all accidents, injuries, near misses or damage to equipment and property to ensure appropriate action can be taken;
- Report to your People Team representative any medical condition or use of medication which could affect your safety or the safety of others;
- Carry out your tasks in a safe manner and follow any instructions, procedures or safe systems of work as provided by your line manager;
- Ensure you know who the First Aiders are for your building or floor;
- Familiarize yourself with your building's fire extinguishers, fire exit and emergency evacuation procedures; and
- Be aware of any hazards associated with your work.

In addition, in the event of any public health crisis, such as the COVID-19 pandemic, Sportradar may establish additional health and safety protocols consistent with applicable government regulations or health directives, including but not limited to guidelines relating to social distancing expectations, health screening and monitoring, and personal hygiene. Sportradar requires all its

employees and others who work or visit Sportradar premises around the world to adhere to such health and safety protocols.

b. Drugs and Alcohol

Drugs and alcohol can impair your ability to work effectively and endanger you and those around you. You are prohibited from entering a Sportradar office or otherwise reporting for work while under the influence of drugs and/or alcohol.

Sportradar prohibits the use, offering, possession, purchase, sale or distribution of illegal drugs and non-prescription controlled substances while in the workplace. Additionally, the Company prohibits the abuse/misuse of prescription drugs while at work, on or off Sportradar premises.

From time to time, we may organize events where alcohol is served on our premises and there may be occasions when you are invited to a client event at which alcohol is served. You are expected to drink responsibly and use good judgment at these events.

Failure to adhere to this policy may result in disciplinary action against you, in accordance with the Sportradar Global Disciplinary Policy. Furthermore, since the possession or use of certain drugs is illegal, violation of this policy could subject you to arrest and prosecution under applicable law.

Where permissible by law, and if necessary, we reserve the right to investigate compliance with this policy, including but not limited to, drug and/or alcohol testing by medical professionals and search of your workspace.

4. Diversity and Equal Opportunity

Sportradar values diversity in the workplace and fosters a diverse and inclusive workplace that promotes both internal and external equal opportunity.

Consult the following Policy for further details on this section:

[Global Diversity and Equality Policy](#)

5. Harassment, Discrimination and Bullying

Sportradar prohibits harassment, discrimination or bullying of any kind that violates the standards set forth herein. Sportradar is committed to ensuring our employees work in a safe and respectful environment free from unlawful discrimination, bullying and harassment.

Every Sportradar officer, director, employee or consultant has an individual responsibility to behave, and ensure others behave, in a manner that is not offensive to others and is required to comply with this Code as well as the robust anti-discrimination, bullying and harassment policies and procedures Sportradar has in place.

Consult the following Policies for further details on this section:

[Anti-Discrimination, Bullying and Harassment Policy](#)

[Global Disciplinary Policy and Procedures](#)

[Global Grievance Policy and Procedure](#)

[Global Diversity and Equality Policy](#)

6. Violence Prevention and Weapons

The safety and security of every Sportradar employee is vitally important. Sportradar will not tolerate violence or threats of violence in, or related to, the workplace. If you experience, witness or otherwise become aware of a violent or potentially violent situation that occurs on Sportradar's property or affects Sportradar's business, you must immediately report the situation to your supervisor, your People Team representative or the Chief Legal Officer.

Absent an exception as approved by Sportradar's Chief Legal Officer, Sportradar strictly prohibits the possession of concealed or unconcealed weapons of any kind on Sportradar property or in vehicles, while on the job or off-site while on Sportradar business, regardless of an employee's ability to legally carry such weapon. Limited exceptions may be considered to enable security personnel to be armed, at the sole discretion of the Company.

III. Business Integrity

Sportradar demands integrity in all its business dealings to avoid any improper advantage or the appearance of questionable conduct by its employees or third parties with whom Sportradar does business.

1. Compliance with Laws

Sportradar is obligated to comply with all applicable laws, rules and regulations. It is your personal responsibility to adhere to the standards and restrictions imposed by these laws, rules and regulations in the performance of your duties for Sportradar.

Employees must comply with any and all applicable internal and external, national and international, laws, rules and regulations, including the requirements of the Securities and Exchange Commission (the "SEC") and Nasdaq, as well as with relevant contractual obligations at all times. The principal financial officers are also required to promote compliance by all employees with the Code and to abide by Sportradar's standards, policies and procedures.

Sportradar has a zero-tolerance approach to employees who commit offenses or crimes in the course of and in connection with his/her employment. This means that every undesirable behavior, violation of company rules and illegal activity will not go unanswered and will be appropriately investigated, addressed, and remedied. Employees must comply with the law even in instances in which obeying the law may lead to a loss of business. For example, the fact that a contract may be lost to a competitor is never an excuse to break the law.

Employees located outside the United States must comply with certain U.S. laws and regulations – including the Foreign Corrupt Practices Act ("FCPA") and U.S. export control laws – in addition to the local laws that are applicable to such employees.

Consult the following Policies for further details on this section:

[Global Anti-Bribery and Anti-Corruption Policy](#)

[Global Trade Controls Policy](#)

2. Bribery and Facilitation Payments

We strictly prohibit the offering or acceptance of bribes or improper inducements, including facilitation payments, to secure business or to gain any advantage either for the Company or for any individual. We recognize that different countries have different laws and varying levels of commitment to addressing bribery. However, we remain committed to conducting our business fairly and ethically.

We expect you to comply with all applicable laws related to bribery and anti-corruption as well as the Sportradar Global Anti-Bribery and Anti-Corruption Policy, which strictly prohibits any Sportradar employee or representative working on our behalf from offering or accepting bribes or kickbacks in any form.

Not only is bribery illegal, but the consequences can be very serious for the Company and for any individuals involved and can include severe fines, penalties and imprisonment.

A few key points:

- Select third parties carefully to ensure they comply with the Sportradar Global Anti-Bribery and Corruption Policy;
- Keep accurate books and records at all times, and monitor that funds are not and/or do not appear to be used for bribery and/or facilitation payments;
- Refuse any offer or request for an unlawful payment and report the incident as prescribed in this Code;
- Never use gifts, meals, travel, or hospitality as a quid pro quo, bribe, or to otherwise improperly influence, induce, or reward business decisions;
- Never promise or offer anything of value with the hope of securing an unfair business advantage; and
- Remember that Sportradar can be held liable for the actions of our representatives and other third parties who work on our behalf.

Consult the following Policy for further details on this section:

[Global Anti-Bribery and Anti-Corruption Policy](#)

3. Anti-Corruption Compliance

The Company is committed to complying with the FCPA, the UK Bribery Act (the “UKBA”) and all other applicable anti-corruption laws. These laws prohibit the Company and its employees, directors, officers and third parties acting on their behalf from offering, giving or promising money or any other item of value, directly or indirectly, to win or retain business or to influence any act or decision of any government official, political party, candidate for political office, or official of a public international organization. The Company prohibits employees, directors and officers from giving or receiving bribes, kickbacks or other inducements to government officials. This prohibition also extends to payments to third parties acting on the Company’s behalf. Giving or receiving bribes, kickbacks or other inducements to private persons is also prohibited. Indirect payments

include any transfer of money or other item of value to another individual or organization where the person making the transfer knows or has reason to know that some or all of that transfer is for the benefit of an individual to whom direct payments are prohibited. The use of agents for the payment of bribes, kickbacks or other inducements is expressly prohibited. Violation of the FCPA, the UKBA and/or any other applicable anti-corruption laws is a crime that can result in severe fines and criminal penalties, as well as disciplinary action by the Company, up to and including, for an employee, termination of employment or, for a director, a request that such director resign from the Board of Directors. For further guidance, please contact the Global Head of Ethics and Compliance or the Chief Legal Officer.

4. Gifts and Hospitality

Creating and maintaining high-quality professional relationships with our current and prospective clients and partners is essential to the success of our business. Modest gifts and hospitality among business partners can be an appropriate way to strengthen ties and build goodwill, but in certain circumstances can create improper influence or the appearance of impropriety, and may be seen as bribes that break the law.

It is essential that you exercise careful judgment in deciding whether the offer or acceptance of gifts and hospitality in particular circumstances is appropriate. In doing so, you should consider whether the offer and/or its acceptance would be normal and reasonable under the circumstances, and ensure that you are acting in a fair and impartial manner in all business dealings.

As a rule of thumb, gifts, meals, travel and hospitality must have a legitimate business purpose, be reasonable and modest in value and frequency, comply with local laws and be accurately recorded. The Sportradar [Global Gifts and Hospitality Policy](#) contains detailed guidance for giving, receiving and disclosing gifts and/or hospitality. While the giving and receiving of gifts/hospitality is not prohibited in general, our policy and corresponding guidelines ensure we address any concerns appropriately and provide a consistent and transparent approach across Sportradar.

In order to ensure transparency and to operate within all applicable regulations and laws, we are required to:

- Use sound judgment and comply with the law and the Sportradar [Global Gifts and Hospitality Policy](#), regarding gifts and other benefits;
- Never allow gifts, hospitality or other personal benefits to influence, induce or reward decisions or undermine the integrity of business relationships;
- Never offer or accept gifts or hospitality that are illegal, immoral or would reflect negatively on the Company, for example, the giving of any item of value when done for the purpose of illegally influencing a government official's actions;
- Never offer or accept cash, cash equivalents, stocks or other securities;
- Never offer or accept any gift or hospitality that is "quid pro quo" (offered for something in return);

- Never offer a gift or hospitality that you pay for personally to avoid having to report or seek approval for; and
- Return any gift that does not align with the Sportradar Global Gifts and Hospitality Policy as soon as practical or if possible, or otherwise turn the gift over to the Corporate Compliance Team who will ensure appropriate action is taken.

Consult the following Policy for further details on this section:

[Global Gifts and Hospitality Policy](#)

5. Trade Controls

Sportradar is committed to complying with all applicable economic and trade sanctions laws and regulations, export controls, and antiboycott regulations (collectively, “Trade Controls”), including those administered by Switzerland, the European Union and its Member States, the United States, and the United Kingdom.

Employees are expected to understand and comply with applicable Trade Controls. Violations of applicable Trade Controls can result in serious consequences for Sportradar and the persons involved, including fines, penalties, and/or imprisonment.

A few key points:

- Employees who receive any indication that a relationship or transaction with a client or counterparty may involve either (1) a country or region subject to comprehensive territory-wide sanctions (currently **Cuba, Venezuela, Iran, Syria, North Korea**, and the **Crimea, Donetsk, Luhansk, Zaporizhzhia and Kherson regions of Ukraine**) or (2) an individual or entity that is the target of sanctions (e.g., an individual identified on a denied parties list like those maintained by the Swiss State Secretariat For Economic Affairs (“SECO”), OFAC’s SDN List, or the EU or UK sanctions lists) should put the pending relationship or transaction on hold and contact the Corporate Compliance Team immediately.
- Employees who receive a request to comply with any boycott that is inconsistent with U.S. law, including the Arab League Boycott of Israel, should put the pending relationship or transaction on hold and contact the Corporate Compliance Team immediately.

The following Policy can be consulted for further details on this section:

[Global Trade Controls Policy](#)

6. Conflicts of Interest

Conflicts can manifest in numerous ways, not all of which are obvious. A conflict of interest can occur when one’s personal activities, investments or associations do or appear to compromise their judgment or ability to act in Sportradar’s best interests. A conflict of interest can also arise when an individual takes action or has an interest that makes it difficult for them to perform their work effectively or interferes with the interests of Sportradar as a whole. A conflict of interest may also arise when an employee or a member of their family, receives improper personal benefits as a result of their position at Sportradar. For purposes of this Code, “family members” include an

employee's spouse or life-partner, siblings, parents, in-laws and/or children, whether such relationships are by blood or adoption.

While we respect every employee's right to manage their personal business and investments, during the course of their employment or engagement, all employees are expected to place Sportradar's interest in any business transaction ahead of any personal interest or gain. Accordingly, at no time shall an employee's activity outside of Sportradar impair or negatively affect the performance of their duties while working at Sportradar. Further, all employees are expected to devote their full efforts to the performance of their duties to Sportradar during their designated or, if none, understood work time.

While having a conflict of interest is not in itself a misconduct, the way a conflict is handled could be. Since it is impossible to describe every potential conflict, we rely on all employees to exercise sound judgment and to seek advice from Corporate Compliance or line managers when necessary and/or appropriate.

The following are some examples of conflicts of interest that could arise and are **prohibited** unless they have been pre-cleared or resolved in advance:

- You or someone with a close relationship to you receives improper personal benefits (such as cash, gifts, hospitality, services, discounts, loans, guarantees or unmerited selection as a supplier, consultant or business partner) as a result of your position at Sportradar;
- You work as an officer, director, employee or consultant at another company which could or, actually does, interfere with your availability or ability to perform your duties to Sportradar;
- You work as an officer, director, employee or consultant at another company that may result in disclosing confidential information or the other company competes with Sportradar;
- You accept a personal business opportunity that you discovered through Sportradar property or information or through your position at Sportradar without first offering the opportunity to Sportradar, if Sportradar might reasonably have a business interest;
- You use Sportradar property, information or your position at Sportradar for personal gain;
- Someone with a close relationship to you, is in direct reporting relationship to you or you have the ability to supervise, review or influence the job evaluation, hiring, pay or benefits of someone with a close relationship to you who also works at Sportradar; or
- You allow any investments held by you or someone in a close relationship with you to influence you in your work for Sportradar. Except under any arrangements made for employees by Sportradar, you must not use any Sportradar transaction for your own or any other individual's personal investment purposes.

We require that all employees promptly disclose any relationships, associations or activities which could create an actual, potential, or even perceived conflict of interest by submitting the [Conflict of Interest Request Form](#).

For any director, executive officer or other principal financial officer, any such relationship must be reported to Sportradar's Global Head of Ethics and Compliance, or designee, and Sportradar's

Chief Legal Officer, or designee, who will work with such person to determine whether a conflict of interest exists and, if so, how best to address it.

All transactions that would give rise to a conflict of interest involving a director, executive officer or principal financial officer must be approved by the Global Head of Ethics and Compliance and Chief Legal Officer and any such approval will not be considered a waiver of this Code, provided at all times that any waivers of the Code and approvals of related party transactions shall be determined by the Audit Committee of the Board.

Consult the following Policy for further details on this section:

[Global Conflict of Interest Policy](#)

7. Accuracy of Business Records and Disclosures

Sportradar must maintain accurate business records. Our records are the basis of our earnings statements, financial reports, regulatory submissions and many other aspects of our business and guide our business decision-making and strategic planning. All financial books, records and accounts must accurately reflect transactions and events, and conform both to International Financial Reporting Standards (“IFRS”) as issued by the International Accounting Standards Board (“IASB”) and to Sportradar’s system of internal controls. No entry may be made that intentionally hides or disguises the true nature of any transaction.

You should therefore attempt to be as clear, concise, truthful and accurate as possible when recording any information.

In addition, the information in Sportradar’s public communications, including in all reports and documents filed with or submitted to the SEC, must be full, fair, accurate, timely and understandable.

To ensure we meet this standard, you (to the extent you are involved in the disclosure process) are required to maintain familiarity with the disclosure requirements, processes and procedures applicable to Sportradar commensurate with their duties. You are prohibited from knowingly misrepresenting, omitting or causing others to misrepresent or omit material facts about Sportradar to others, including Sportradar’s independent auditors, governmental regulators and self-regulatory organizations.

The Company’s principal financial officers and other employees working in the finance department have a special responsibility to ensure that all of our financial disclosures are full, fair, accurate, timely and understandable. These employees must understand and strictly comply with all applicable standards, laws and regulations for accounting and financial reporting of transactions, estimates and forecasts.

8. Corporate Opportunities

You owe a duty to Sportradar to advance the legitimate interests of Sportradar when the opportunity to do so arises. You are prohibited from directly or indirectly (a) taking personally for yourself opportunities that are discovered through the use of Sportradar property, information or positions; (b) using Sportradar property, information or positions for personal gain; or (c) competing with Sportradar for business opportunities; provided, however, if the disinterested directors of the Board determine that Sportradar will not pursue an opportunity that relates to

Sportradar's business, you may do so, after notifying the disinterested directors of the Board of intended actions in order to avoid any appearance of conflict of interest.

9. Corporate Loans or Guarantees

Sportradar is prohibited from making loans and guarantees of obligations to directors, executive officers, and members of their immediate families under United States federal law.

10. Company Contracts

Only officers and select employees are authorized to sign contracts, agreements and certifications on behalf of Sportradar and its subsidiaries. Such contracts may include sales agreements, real estate leases, vendor agreements, employment offers, among others. Your failure to follow this policy could result in materially adverse consequences for Sportradar. If you have not been authorized in writing to sign such contracts, you are not permitted to do so. All questions as to signature authority shall be referred to the Legal Team.

11. Fair Dealing, Fair Competition and Marketing Practices

You should deal fairly with our clients, service providers, suppliers, competitors and employees. You should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts, or any unfair dealing practice.

Inappropriate use of proprietary information, misusing trade secret information that was obtained without the owner's consent, or inducing such disclosures by past or present employees of other companies is also prohibited.

Fair and free competition is protected by applicable competition and antitrust legislation. Complying with this legislation ensures that market competition is not distorted, which is in the interest of all market players. Anti-competitive conduct has the potential not only to significantly damage Sportradar's reputation, but also to cause Sportradar to incur severe civil and criminal fines and penalties.

All Sportradar employees shall contribute to the Company's efforts to comply with all relevant fair competition laws and regulations. You must not directly or indirectly enter into any formal or informal agreement with competitors that fixes or controls prices, divides or allocates markets, limits the production or sale of products, boycotts certain suppliers or clients, eliminates competition or otherwise unreasonably restrains trade.

You should be aware that agreements with other parties regarding a certain conduct on relevant markets and similar occurrences may constitute violations of fair competition laws and regulations. If in doubt, please seek advice from the Chief Legal Officer or Legal Team.

All Sportradar employees shall market and sell Sportradar products and services in compliance with all applicable rules and regulations, and in line with high ethical standards. This also applies to all other activities relating to the commercialization of Sportradar products and services such as the collection and communication of information.

Competitors are treated fairly in accordance with applicable laws and regulations. We do not knowingly make false or misleading statements about our competitors, and neither do we publicly criticize them.

Consult the following Policy for further details on this section:

[Sportradar Competition Policy](#)

12. Prevention of Money Laundering, Financing of Terrorism and Illegal Activities

Sportradar acknowledges the importance of preventing money laundering, terrorist financing, dealing with criminal property and financing of illegal activities, and undertakes best efforts to prevent the Company, clients and employees from either intentionally or unintentionally engaging in or aiding these activities.

Sportradar complies with all applicable laws and regulations related to the prevention of money laundering and conducts customer due diligence in an effort to mitigate and prevent any potential wrongdoing.

Sportradar enforces a [Customer Due Diligence \(“CDD”\) Policy](#) and maintains relevant processes and procedures to ensure satisfaction of the Policy and its requirements. The CDD processes employed by Sportradar take a risk-based approach to gain a better understanding of the industry and identify those clients or areas that may pose the greatest risk of money laundering and/or other illegal activities.

Consult the following Policies for further details on this section:

[Global Customer Due Diligence Policy](#)

[Global Anti-Money Laundering and Counter-Terrorism Policy](#)

IV. Protection of our Reputation

1. External Communication

Ensuring the integrity of our reputation is important and what we say publicly matters. We are committed to clear and truthful communications.

To ensure our communication is clear, truthful, consistent and in compliance with the provisions set forth in the Code of Business Conduct and Ethics, you should not make any public statements or issue any material on the Company’s behalf on any issue relating to the Company unless specifically authorized to do so by the Global Communications Team. In addition, all external speaking engagements must be approved in advance by the Global Communications Team.

Similarly, all enquiries from investors, potential investors, expert networks and analysts should be forwarded to the Investor Relations team. If in doubt, please speak to the Head of Communications or the Head of Investor Relations at the earliest opportunity.

2. Use of Social Media

Although social media platforms provide additional opportunities to engage with our stakeholders, we must be thoughtful about how social media is utilized, as it can have an unintended impact on the Company, our clients, our partners and even our obligations under the law.

We must therefore exercise good judgment when using social media, remembering that we will be accountable for any information we publish online. **You should remember your personal**

and business identities are likely to overlap. You should conduct yourself in a responsible, respectful, honest manner at **all times**.

Employees must not:

- “Pretext”, or pretend to be someone they are not online;
- Speak on behalf of the Company if they are not expressly authorized to do so;
- Share proprietary, confidential, sensitive or trade secret information of the Company, its partners, vendors, consultants or other third parties with which the Company does business;
- Post comments, pictures or videos that could harm the Company’s brand, reputation or commercial interests;
- Post Sportradar logos that are not explicitly authorized or approved by the marketing team (marketing@sportradar.com);
- Harass other directors, officers, employees, or consultants; or
- Provide any content to Company social media sites that may be construed as political lobbying or solicitation of contributions, or use the sites to link to any sites sponsored by or endorsing political candidates or parties, or to discuss political campaigns, political issues or positions on any legislation or law.

How you conduct yourself in the online social media space not only reflects on you – it is a direct reflection on Sportradar.

If in doubt, please speak to the Global Communications Team at the earliest opportunity.

Consult the following Policy for further details on this section:

[Global Social Media Policy](#)

V. Protection of Information and Assets

1. Confidentiality

Information and data are two of Sportradar’s most valuable assets. We develop and possess extensive information and trade secrets from both internal and external sources. This includes confidential and non-public information that can be useful to our competitors or that would be harmful to our clients, employees, our partners and us if disclosed.

This means we should consider any information about Sportradar, our clients, and other third parties to be confidential, unless we know for certain that the information is public or we are permitted or obliged by law to share. Once this is certain, we may share such information only on a need-to-know basis. Examples of confidential information include:

- Client lists
- Supplier lists

- Pricing information
- Terms of contracts
- Company policies and procedures
- Financial statements
- Financial prospects
- Marketing plans and strategies
- Trade secrets
- Employee information
- Technical documentation
- Raw data, including trading performance information
- Technical codebase
- Research and development ideas
- New product plans
- Potential acquisitions or investments
- Third-party information

The use of confidential information, either directly or indirectly, for personal benefit, the benefit of others, or to the detriment of Sportradar, is prohibited. This prohibition includes, but is not limited to, inquiries made by the press, analysts, investors or others.

We have an important duty to respect confidential information and ensure we do all we can to protect it, by doing so, we are able to enhance the confidence of our clients and others. This responsibility exists while at work and also when we are away from the office.

Things to remember when dealing with confidential information:

- Information has many forms from email, databases, voicemail and websites through to paper-based communication, photos and videos and not all information will be marked as confidential;
- Never discuss confidential information in public places;
- Keep all confidential information in a safe place and take care not to lose or misplace it;
- Never share confidential information with someone who does not have the permission to receive it;
- Only use secure devices as specified by IT to store and manage confidential information;

- Diligently review client engagement contracts that can contain additional confidentiality clauses and understand our obligations under these contracts;

If you have any questions around what constitutes confidential information, how it should be stored or disposed of, then please contact your line manager, the Global Head of Ethics and Compliance or the Chief Legal Officer.

Remember that these confidentiality obligations continue even after employment with Sportradar ends.

2. Privacy and Data Protection

Our clients, employees and stakeholders expect that we will handle the information, including any personal data, that they share with us appropriately and in accordance with applicable data protection laws. A breach of data protection laws can seriously affect our Company or you personally, by way of fines, loss of reputation or even criminal prosecution.

Adherence to the law and Sportradar's policies on privacy and data protection is extremely important. Sportradar has therefore taken the appropriate organizational, technical and contractual measures to comply with the EU General Data Protection Regulation (GDPR), the Swiss Federal Act on Data Protection (FADP), the United Kingdom's Data Protection Act 2018 (UK DPA), the California Consumer Privacy Act (CCPA), as amended by the California Privacy Rights Act (CPRA), as well as any applicable national or state data protection laws and regulations.

Before you collect, store, use, transfer or otherwise process personal data and change any existing processes, products, services, or applications or create a new one, you should contact our Privacy Team who can provide you with further guidance.

Consult the following Policy for further details on this section:

[Global Privacy Manual](#)

This Global Privacy Manual provides an overview of all Sportradar's processes and policies regarding data protection and privacy. All Sportradar employees must be familiar with it and the respective policies and processes.

3. Information Security Measures

At Sportradar we recognize that the protection of our clients' sensitive data and the integrity of our systems are paramount in the rapidly evolving landscape of cybersecurity threats. We remain accountable for all the information assets and have a legal duty of care as well as the expectations of clients, shareholders and regulators to ensure that all Sportradar's information assets are protected from unauthorized access, use, disclosure, alteration, destruction, and/or theft. We have organized ourselves to be able to combat the threat we face in the ever-changing technology landscape.

Ensuring protection against any security threat or unauthorized disclosure is vital to maintaining our competitive edge and maintaining the trust of our clients, shareholders as well as other stakeholders. This challenge is not only a task for the Information Security team but also for every employee and contractor who has access to the informational resources of our company.

Every employee and contractor shall be aware that security incidents that compromise Sportradar's information and information systems can have serious repercussions, including but not limited to, obstructing our mission capabilities, financial losses, damage to our reputation, potential lawsuits, and even criminal prosecution. As a result, it is crucial for each team member to play an active role in upholding information security. As such, this is crucial that every employee or contractor knows how to protect the informational resources of Sportradar- by reporting security events (e.g., suspicious emails or phone calls), informing other colleagues about potential cyber threats, as well as familiarizing themselves with cybersecurity aspects in collaboration with the Information Security team.

To uphold the highest standards, Sportradar has implemented reasonable and appropriate measures to protect the confidentiality, integrity, and availability of the information we collect, store, process, and transmit. These measures align with the newest information security standards, frameworks, and best practices, as well as relevant data privacy laws and regulations.

As the threat landscape is ever evolving, we continuously strive to enhance our security measures to stay ahead of potential risks and challenges. Every Sportradar employee or contractor who informs the Information Security team can be a source of knowledge about risks, including those related to cybersecurity field.

At Sportradar, we recognize that continuous education and awareness are critical components of our comprehensive approach to information security. To ensure that all employees are equipped with the necessary knowledge to protect our sensitive data and systems, it is expected that every staff member completes an annual security awareness training. Additionally, developers are required to undergo yearly secure development coding training to stay updated on the best practices for creating and maintaining secure software.

Our commitment to safeguarding sensitive and strategic data is paramount. Therefore, everyone must be aware that sharing data classified as highly confidential should only occur under appropriate conditions and with the implementation of adequate security controls. This includes using approved secure communication channels and adhering to strict access controls to prevent unauthorized disclosure. Your vigilance and adherence to these protocols are essential in maintaining the trust and security of our information assets. For more details, please read [Secure File Sharing Guideline](#).

As an employee or contractor of Sportradar, you are responsible for understanding your role in providing information security and are encouraged to familiarize yourself with the policies and procedures in place.

Access to Sportradar's Information Security policies, guidelines, standards, and related procedures can be found via the link:

[Information Security Policies](#)

If you have any inquiries or questions about these policies and standards, do not hesitate to reach out to a member of our Information Security Unit. Your proactive involvement in maintaining information security is instrumental in safeguarding the success and longevity of Sportradar.

4. Protection and Proper Use of Company Assets

You should protect Sportradar's assets and ensure their efficient use. Theft, carelessness and waste have a direct impact on our profitability. All of Sportradar's assets should be used only for legitimate business purposes.

The obligation of employees to protect Sportradar's assets includes its proprietary information. Proprietary information includes intellectual property such as trade secrets, patents, trademarks and copyrights (see "Intellectual Property Rights" below), as well as business, marketing and service plans, engineering and manufacturing ideas, designs, databases, records, salary information and any unpublished financial data and reports.

5. Sports Betting Policy

Sportradar deals with highly sensitive data in the field of sports betting and odds. An important aspect of Sportradar's core business is to provide clients with this data and to receive such data from its clients. In addition, we provide betting Integrity Services to numerous sports federations and state authorities. Therefore, it is essential for Sportradar's business to visibly maintain a high level of integrity, confidentiality and security.

Neither Employees nor Contractors are permitted to bet, directly or on any content generated and offered by Sportradar. Should there be a situation where you need to bet for business purposes, you must seek written permission from your Unit Lead and send the request to the Compliance team.

Consult the following Policy for further details on this section:

[Global Sports Betting Policy](#)

6. Intellectual Property Rights

We protect our investments in intangible assets by obtaining, enforcing and defending intellectual property (IP) rights and by maintaining confidentiality of sensitive information. Intellectual property rights cover a variety of things, including inventions and innovations, trademarks, designs, and copyright in things such as text, images, drawings and software. IP can also refer to information or ideas that are confidential and commercially valuable, and also to data. Sportradar both owns IP and licenses IP from third parties. New IP-protected works are created every day in our operations. This can be trademarks, patents, and/or copyright in new documents or software codes, innovations or discoveries from our exploration or research and development, or from work done with clients to integrate our services. IP created, developed or obtained by employees of Sportradar and related to their employment belongs to Sportradar and shall be used only for the benefit of Sportradar.

Employees must take care to protect Sportradar's owned and licensed IP. The value of our IP can be lost by improper disclosure or use, inappropriate contractual terms, or failing to follow necessary formalities for protection. To safeguard our IP, never disclose confidential Sportradar IP without authorization. This applies during and after your employment with Sportradar. If there is a legitimate reason to share Sportradar's confidential information and/or IP — such as where required to work with a supplier — you should obtain permission from your line manager and use our standard Non-Disclosure Agreement or another written confidentiality agreement prior to disclosure. Employees should always use Sportradar's standard contract templates when contracting with clients and third-party service providers unless the Legal Team has approved

alternative terms. If you create new IP, such as innovations and improvements to our processes, keep it confidential and ask the Legal Team if any other protection is required.

We also respect legitimate IP rights of others. Misusing the IP of third parties could result in costly legal disputes that may impede Sportradar's business pursuit and may damage our reputation. Respecting the IP of others means we (i) obtain proper authorization and licensing agreements before using any intellectual property belonging to a third party and strictly follow the terms of use, (ii) respect copyrights, trademarks, logos, likenesses and other intellectual property in our advertisements and marketing activities, and (iii) respect and avoid knowing infringement upon the intellectual property rights of third parties, such as clients, vendors or competitors.

Before you copy or share something provided by a third party or deploy new technology, always check with the Chief Legal Officer or Legal Team as to whether a third party's IP rights might be infringed.

7. Insider Trading

Employees, consultants and contractors engaged by Sportradar may, in connection with their employment become aware of material, non-public information regarding Sportradar, publicly traded companies, potential mergers and acquisitions, and other related information. Material information is information of such importance that it can be expected to affect the judgment of investors as to whether or not to buy, sell or hold the securities in question.

Consistent with our Insider Trading Compliance Policy, if you are in possession of material non-public information about Sportradar or companies with which we do business, you and select family members must abstain from trading or advising others to trade in the respective company's securities from the time that they obtain such inside information until adequate public disclosure of the information has been made. National, federal, provincial, state, and/or local securities laws and market abuse laws and regulations prohibit the purchase or sale of securities by persons who are aware of material, non-public information about a company, as well as the disclosure of material, non-public information about a company to others who then trade in the Company's securities ("Insider Trading Laws"). To use non-public information for personal financial benefit or to "tip" others, including family members, who might make an investment decision based on this information is not only unethical but also illegal. Violation of Insider Trading Laws can result in severe fines and criminal penalties, as well as disciplinary action by the Company, including termination of employment.

As a condition of your employment with Sportradar – whether by employment contract, consultancy agreement, subcontractor status, or otherwise – you acknowledge that you and select family members may be prohibited by law from using, or assisting others to use, such material, non-public information gained during the course of your employment in connection with the purchase or sale of any securities on the basis of such material, non-public information, and hereby agree to not violate such Insider Trading Laws. Further, there are various blackout periods during the year in which those people designated as "insiders" cannot trade (buy or sell) company stock. All "insiders" and certain family members and affiliated entities can trade only during designated "open trading windows" following pre-clearance by the Legal Department as provided in the Insider Trading Compliance Policy. Employees that are deemed "insiders" will be notified from time to time by the Legal Department.

You are required to carefully review and observe the Company's Insider Trading Compliance Policy, as in effect from time to time.

Consult the following Policy for further details on this section:

[Insider Trading Policy](#)

VI. Consequences of Non-Compliance

Failure to comply with the provisions of this Code may expose employees and Sportradar to reputational damage as well as legal and regulatory sanctions. Violations and breaches of the law are not tolerated and will be penalized.

All employees of Sportradar as well as consultants, contractors engaged by Sportradar are obliged to adhere and comply with this Code.

The Chief Legal Officer operates a training program to communicate the content of the Code. If an employee is unsure of the meaning of any of the provisions of the Code, they are required to obtain advice from the Global Head of Ethics and Compliance or the Chief Legal Officer.

In addition, failure to comply with the Code (including without limitation any failure to report actual or suspected violations of the Code) may result in disciplinary action by Sportradar.

VII. Code of Business Conduct and Ethics Acknowledgement

By certifying to the Sportradar Code of Business Conduct and Ethics, you acknowledge that:

- You have read the Code in its entirety and understand your responsibilities related to it
- You have had the opportunity to ask questions to clarify any unclear aspects of the Code
- You agree to abide by its principles
- You agree to report to the Company any violations of the Code
- You agree to cooperate in any investigations of violations of the Code

Print Name:

Signature:

Document Information :

Document	Code of Business Conduct and Ethics
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Contact person	Lynn McCreary, Chief Legal Officer and Corporate Secretary Xavier Varin, SVP, Global Head of Ethics and Compliance
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Area of application	All Sportradar Group companies

Amendments or changes:

Version	Date	Reason(s) for and extent of changes	Approved by
V.2	12.01.2021	Ongoing regular update	Orest Kucan
V.3	26.08.2021	Update for compliance with applicable laws and regulations in connection with IPO, including SEC and Nasdaq requirements	Board of Directors on 17.08.2021
V.4	12.08.2022	Ongoing regular update	Board of Directors on 12.08.2022
V.5	16.08.2023	Ongoing regular update	Board of Directors on 16.08.2023
V.6	08.08.2024	Ongoing regular update	Board of Directors on 08.08.2024