

CODE OF CONDUCT FOR SUPPLIERS



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1. Introduction

At Sportradar, ethics and integrity are the guiding principles of everything we do. Our suppliers are vitally important to our business, and they play a key role in the success of the Company. This “Code of Conduct for Suppliers” defines the fundamental requirements Sportradar expects its suppliers and their subcontractors to fulfil as a precondition for cooperation.

To ensure a successful partnership, Sportradar insists on a mutual agreement to safeguard the social and environmental standards set out in the Universal Declaration of Human Rights of the United Nations, the International Labour Organization, as well as country specific laws and regulations.

If a supplier or subcontractor violates this Code of Conduct, Sportradar will employ necessary measures to correct the non-compliance with the supplier. If no corrective measures or action plan to remedy non-compliance is provided by the supplier, this may result in Sportradar immediately terminating the business relationship, including any subordinate delivery agreements, as well as all related open liabilities from goods and services.

2. Social Sustainability

2.1 Fair Treatment and Equal Opportunities

We expect our suppliers to provide their employees with a safe and healthy environment. Suppliers’ employees should never be subjected to abuse, harassment or threatening behaviour, and any disciplinary measures taken ought to be recorded. Employees should have access to a written grievance or request method that is clear and understandable, and the means to ask for an explanation when required.

Sportradar insists that its suppliers avoid discrimination, meaning all employees shall have the right to equal treatment and opportunities. Any discrimination on the grounds of gender, age, religion, philosophy, race, caste, social background, disability, ethnic and national origin, nationality, membership of employee organisations including unions, political ethos, sexual identity or due to any other personal characteristics, for example with regards to employment, wages, access to further training, promotion, ending of the employment relationship or retirement, shall be prohibited.

ILO Convention 110 (C110 Plantations Convention, 1958)

ILO Convention 111 (C111 Discrimination (Employment and Occupation) Convention, 1958)

ILO Convention 159 (C159 Vocational Rehabilitation and Employment (Disabled Persons) Convention, 1983)

2.2 Prohibition of child labour

Commercial exploitation of children as well as the employment of children is prohibited. Suppliers must comply with all legal prerequisites as Sportradar will not tolerate any working conditions or treatment of employees that violate international agreements such as the UN's Universal Declaration of Human Rights or the standards of the International Labour Organization.

ILO Convention 79 (C79 Night Work of Young Persons (Non-Industrial Occupations) Convention, 1946)

ILO Convention 138 (C138 Minimum Age Convention, 1973)

ILO Convention 142 (C142 Human Resources Development Convention, 1975)

ILO Convention 182 (C182 Worst Forms of Child Labour Convention, 1999)

2.3 Forced labour

Sportradar's suppliers shall guarantee that any employment is freely chosen by the employees. Any form of forced labour is rejected and will not tolerate any working conditions or treatment of employees that violate international agreements.

ILO Convention 29 (C29 Forced Labour Convention, 1930)

ILO Convention 105 (C105 Abolition of Forced Labour Convention, 1957)

2.4 Occupational health and safety

Sportradar's partners shall guarantee health and safety in the workplace. In order to prevent accidents or injuries and actively manage risk, all applicable environmental, health and workplace safety regulations and procedures must be introduced and communicated to the employees. Relevant training should be provided to employees.

2.5 Working time

Sportradar's suppliers and subcontractors shall regulate the employees' working time in accordance with the labour laws of the relevant country.

ILO Convention 1 (C1 Hours of Work (Industry) Convention, 1919)

ILO Convention 14 (C14 Weekly Rest (Industry) Convention, 1921)

2.6 Remuneration

The remuneration for regular work hours and overtime must be in accordance with the labour laws of the relevant country. If these remunerations are not high enough to cover minimum living expenses, the business partner shall be obliged to increase remuneration up to the level, which covers the basic requirements. Sportradar does not tolerate unauthorised deductions in remuneration as well as deductions in remuneration as a disciplinary measure.

ILO Convention 26 (C26 Minimum Wage-Fixing Machinery Convention, 1928)

ILO Convention 131 (C131 Minimum Wage Fixing Convention, 1970)

2.7 Harassment, Discrimination and Bullying

Suppliers must respect the significance of open communication and support dialogue between employees and management about working conditions without fear of retaliation. Suppliers of Sportradar should not tolerate any behaviour that could negatively affect an individual's work performance or our workplace as a whole and this includes any conduct or behaviour amounting to harassment, discrimination and bullying in any form including physical, verbal or visual.

3. Ethical Business

Sportradar has a zero-tolerance approach to suppliers who commit offenses or crimes in the course and scope of their relationship with Sportradar. We expect our suppliers to maintain the most elevated standards of integrity, transparency, and governance, and to abide all relevant legislation and regulations.

3.1 Bribery, Corruption, and Improper Payments

Sportradar is subject to anti-corruption laws in countries where we do business. Consistent with these laws, and with Sportradar's commitment to conducting business honestly, ethically, and with integrity, Sportradar, and all persons and entities that act on Sportradar's behalf, including suppliers, are prohibited from paying, offering, giving, authorizing, or promising, either directly or indirectly, "anything of value" to any "government official," or any other person, in order to secure an improper advantage, obtain or retain business, or direct business to any other person or entity. Sportradar expects its suppliers to comply with all applicable anti-bribery and anti-corruption laws. Sportradar will not tolerate the offering or receiving of bribes, or any other form of improper payments, including small payments to government officials to expedite or secure official actions (otherwise known as "facilitation payments").

3.2 Gifts and Entertainment

Unless specifically authorized in writing by Sportradar, suppliers are prohibited from offering, giving, soliciting, or accepting any gifts or hospitality to any third party in connection with their relationship with Sportradar.

In addition, suppliers will not give or offer to any Sportradar employee:

- anything of value, gift(s) or hospitalites in excess of a value of 50 €; or
- anything of value, gift(s) or hospitalities in order to secure, induce or reward an improper benefit or improper performance of a function or activity.

3.3 Conflicts of Interest

Suppliers must inform Sportradar of any perceived, potential or actual conflict of interest that could potentially have an impact on any business interest of Sportradar. Suppliers are required to inform Sportradar of such actual or potential conflicts as soon as they become aware. Any activity that has been approved, despite the actual or apparent conflict, must be documented and submitted to the Compliance Team at compliance@sportradar.com.

3.4 Anti-Money Laundering

Suppliers must comply with all applicable anti-money laundering laws and regulations. Suppliers are expected to inform Sportradar if they become aware of any actual or suspected violations of applicable anti-money laundering laws. Any such information from Suppliers should be directed to the Compliance Team via e-mail at compliance@sportradar.com.

3.5 Economic Sanctions

Suppliers must adhere to all relevant restrictions on the import and export of goods, equipment/tools, software, services, and technology, as well as all applicable economic sanctions and restrictions on doing business with specific countries, regions, businesses or entities, and individuals. Sportradar will not enter into any agreements where sanctions prohibit such agreements or with sanctioned individuals or persons located in countries where sanctions prohibit such agreements. Neither with Sportradar violate any applicable sanctions by participating in or facilitating any transactions involving a sanctioned country or person.

3.6 Confidentiality

Suppliers must comply with all legal requirements in connection with the handling of confidential and proprietary information. In addition, suppliers must protect any confidential or proprietary Sportradar data or information from unauthorized access, use, modification or destruction through appropriate physical and electronic measures.

3.7 Data Protection

Suppliers must comply with all applicable data privacy laws. Suppliers who can illustrate similar guidelines with respect to data protection are encouraged. Suppliers must immediately report to the Sportradar compliance office when unauthorized use, disclosure, or loss of personal Sportradar information is found.

3.8 Insider Trading

Suppliers and their employees must not utilize any material or non-publicly disclosed information acquired over the span of their business relationship with Sportradar as the basis for trading or enabling others to trade in the securities of Sportradar or any other company.

3.9 Whistleblowing

Suppliers are expected to have policies and procedures to encourage workers who have legitimate concerns about legal or ethical matters to report such concerns. Suppliers are also expected to protect whistleblowers from harassment and retaliation.

4. Environmental Sustainability

Environmental sustainability and the protection of human life and nature should be promoted by Sportradar's partners. Commitment to reducing negative environmental impacts, and the application of environmentally friendly technologies, procedures and standards for resource management, reduced emissions and waste management should correspond to or exceed the statutory minimums.

Suppliers should have an effective environmental policy in place. Environmental performance should be monitored and reviewed regularly and when required continuous improvements be made. Suppliers should strive to make workable endeavors to reduce the generated waste.

Specification: Existence of an environmental management system, e.g. in accordance with ISO 14001

5. Compliance with the Supplier Code of Conduct

Sportradar Group reserves the right, with fair notice, to inspect compliance with the Supplier Code of Conduct's criteria. Sportradar Group encourages its suppliers to develop and apply their own ethical guidelines.

Any breach of the supplier's obligations will subject the supplier to discipline, up to and including termination.

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