# Sportradar UK Modern Slavery Statement 2024





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#### 1. Introduction

This Statement ("Statement") is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been approved by the Board of Directors of Sportradar UK Ltd. ("Sportradar") as of December 2024. This Statement details Sportradar UK's continual efforts to identify, prevent and address any risk of modern slavery within its supply chain and operations.

Sportradar UK and its affiliated companies prohibit any form of slavery, human trafficking, forced labour, or other similar work environments or practices. Sportradar UK conducts all business in a manner reflecting our high standards of ethics and integrity. Sportradar UK remains committed to ensuring that modern slavery and human trafficking do not take place in any part of our business or supply chains.

#### 2. Organisational Structure

Sportradar UK Ltd. is a subsidiary of Sportradar Group AG ("Sportradar"), founded in 2001, a Swiss global company that employs more than 4,250 full-time employees in 24 countries.

Sportradar is a leading global sports technology company positioned at the intersection of the sports, media and betting industries. We provide sports federations, news media, consumer platforms and sports-betting operators with a best-in-class range of solutions to help grow their businesses.

At the same time, Sportradar strives to safeguard the industry through Sportradar Integrity Services initiatives and impact, maintaining sport as a great unifier across the globe. We provide mission-critical software, data and content via subscription and revenue-share arrangements to sports leagues and federations, betting operators and media companies.

Since Sportradar's founding, the company has been at the forefront of innovation in the sportsbetting industry and we continue to be a global leader in understanding, leveraging and monetizing the power of sports data.

Our suppliers are vitally important to our business, and they play a key role in the success of the Company. Our main sourcing categories are hardware, software and marketing. 34% of our strategic suppliers defined by the business are from the USA, 13% from UK, 7% from Germany. The rest are coming from other countries such as Austria, Switzerland, the Netherlands. France, Canada, Ireland and other.

#### 3. Sustainable Procurement

Sportradar's procurement processes are governed by our 2023 Procurement Policy. It ensures all procurement decisions are underpinned by fundamental standards in considering data protection, health and safety, anti-avoidance and anticorruption, employment and human rights.

It does so by incorporating principles from the International Organization for Standardization (ISO) sustainable-procurement guidelines and the applicable United Nations procurement strategy. By doing this, we can provide for the UN's Sustainable Development Goals that apply to our activity, while remaining a competitive and agile business.

Supplementing our Procurement Policy are the following key governance documents:

- The Sportradar Code of Business Conduct and Ethics
- The Code of Conduct for Suppliers

In line with the central principles of sustainability reporting, these provide a commitment to relevant, faithfully represented, verifiable, timely and understandable disclosures.

Through both the Code of Business Conduct and Ethics and the Procurement Policy, our commitment is to ensure our procurement processes remain:

- Fair, unbiased and consistent
- Compliant with applicable laws and regulations
- Rooted in transparent and objective criteria, free from personal interests, biases or other untoward or political influences
- In line with the delegation of authority as described in the DoA Matrix
- Timely, with all records maintained in as complete and accurate a manner as possible

Moreover, our Code of Conduct for Suppliers delivers sustainability in our value chain. It does so by drawing on International Labour Organization Conventions that:

- Prohibit forced and child labor
- Encourage appropriate working time and remuneration
- Demand fair treatment and equal opportunities

Among other things, the governance documents also contain supplementary directives requiring Sportradar's people, our vendors and their subcontractors throughout our supply chain to:

- Ensure and improve occupational health and safety
- Prevent harassment, discrimination and bullying
- Eliminate bribery, corruption, money laundering and conflicts of interest

Any breach of our guidelines by any supplier risks penalty, up to and including the immediate termination of the business relationship with Sportradar.

#### "Our commitment to ethical conduct is foundational to our ability to occupy and maintain our unique position within the sports business ecosystem."

Carsten Koerl, CEO, and Jeff Yabuki, Chairman of the Board of Sportradar

#### 4. Policies in relation to Modern Slavery

Sportradar maintains policies that identify, prevent, and/or address any risk of modern slavery, which include the following:

**Code of Business Conduct and Ethics** codifies Sportradar's professional and ethical expectations to employees and third parties acting for or on behalf of Sportradar. The Code provides 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 Code specifies that 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.

**Code of Conduct for suppliers** defines the fundamental requirements Sportradar expects its suppliers and their subcontractors to fulfil as a precondition for cooperation. Suppliers are required to adhere to this Code, which prohibits the use of forced labor, encourage appropriate working time and remuneration and demand fair treatment and equal opportunities

Our suppliers are vitally important to our business, and they play a key role in the success of the Company. 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.

**Procurement Policy** ensures all procurement decisions are underpinned by fundamental standards including employment and human rights and comply with internal policies including the Code of Conduct for Suppliers and the Code of Business Conduct and Ethics.

**Whistleblowing Policy** outlines how employees and third parties can report unethical, illegal, or improper activities in a safe and confidential manner, with the knowledge that any complaint submitted in good faith will be taken seriously and investigated as appropriate.

**Diversity and Equity Policy** establishes that every individual performing services for Sportradar, including employees, contractors, and suppliers, has the right to fair and equal treatment, and a safe working environment that values and respects each individual.

Anti-Discrimination, Bullying, and Harassment Policy defines a working environment in which individual differences are valued and respected and all employees have a right to work in an environment that is free from all forms of bullying, discrimination and harassment.

#### 5. Due Diligence Process

Any purchase or engagement for services with external parties inherently exposes Sportradar (and possibly its members) to a variety of risks.

Supply chain risk assessments are performed to ensure that Sportradar only deals with legitimate and reputable suppliers and to protect the confidentiality, integrity and availability of Sportradar data and assets. The assessment is mandatory if a supplier is handling personal data or any company confidential information; if the product/service supplied is connecting to Sportradar infrastructure or impacting Sportradar's physical or logical security; or if the supplier is representing Sportradar. Due diligence is performed by teams from Security, Privacy, Compliance, Technical and Procurement to assess financial standing, compatibility with Sportradar infrastructure, links to sanctioned countries, politically exposed people or adverse media, whether personal data is processed in accordance with any applicable data protection legislations and whether there are adequate information security measures implemented proportionate to the scope of service.



Sportradar also conducts screening of suppliers prior to the initiation of any business relationship or the execution of contractual agreements to ensure there is no involvement in modern slavery, forced labor, or human trafficking. Periodic ongoing screening is then performed to ensure continued compliance with ethical standards.

#### 6. Training and Awareness

Our mandatory e-learning training programs include training on the Code of Business Conduct and Ethics and Diversity and Equity in the Workplace.

Training completion rates in 2024:

**100%** of employees for the Code of Business Conduct and Ethics (2023: 100%)

**100%** of employees for Diversity and Equity in the Workplace (2023: 100%)

## 7. Measuring effectiveness

To ensure that Sportradar is not engaged in the procurement of child labor, the company conducted multiple inquiries into our employment practices and supply chain. The inquiries and results are on file with the company and have been reported to the Board of Directors. As a result of the review, Sportradar can state we have no indication of any use of child labor within Sportradar Group or our supply chain.

Additionally, in 2024, Sportradar's whistleblowing hotline received no reports of human-rights issues.

This statement was approved by the Board of Directors of Sportradar UK Ltd

Warren Murph

Warren Murphy Director

Daniel Ferner

Daniel Fenner Director

Darren Small

Darren Small Director