

Global Anti-Discrimination, Bullying, and Harassment Policy

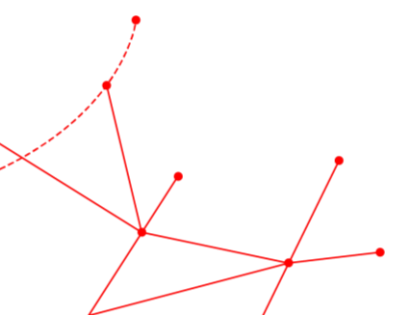
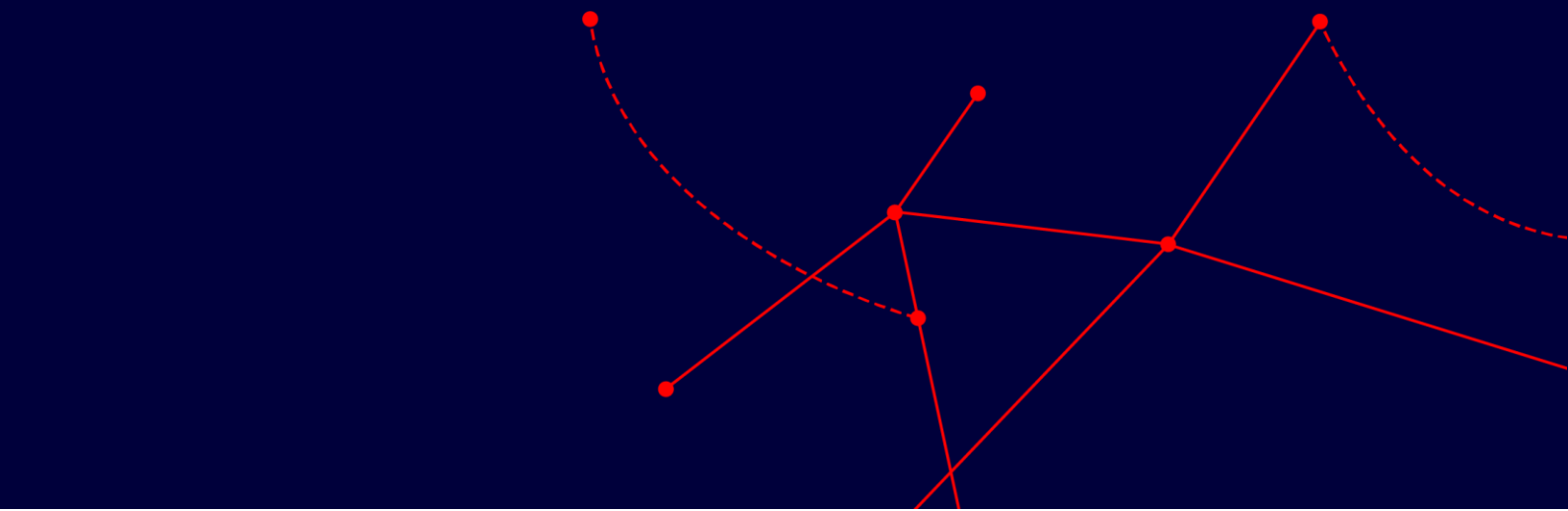
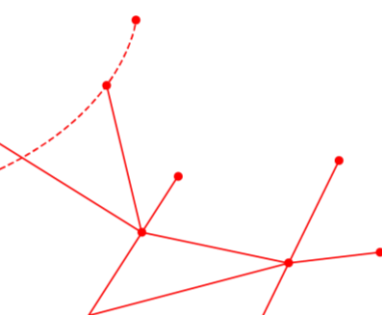


Table of Contents

1. Introduction	4
2. Scope and responsibilities	4
3. Standards and expectations	4
4. What constitutes discrimination?	5
5. What constitutes Harassment?	5
6. What constitutes Sexual Harassment?	6
7. What is Bullying?	6
8. Resolving Complaints.....	7
Document Information:	8
Amendments or changes:.....	8



1. Introduction

Sportradar is committed to creating a working environment in which individual differences are valued and respected. All employees have a right to work in an environment that is free from all forms of bullying, discrimination and harassment.

This policy and its procedures should be read in conjunction with Sportradar's Global Diversity and Equality Policy and any applicable country-specific policy and laws governing the relevant subject matter. This policy covers bullying, discrimination and harassment by and against our employees, independent contractors, as well as third parties such as suppliers or visitors to any of our premises. This behaviour is inclusive of conduct during and outside of work time, such as at work related social activities, communications with colleagues, or on social media interactions with colleagues.

This policy does not form part of the employee's contract of employment, and Sportradar may amend it at any time.

2. Scope and responsibilities

Each individual within Sportradar has a right to be treated with dignity and respect. Behaviour that is derogatory or displays unduly or unreasonably negative attitudes towards others, however subtly conveyed, is unacceptable and will not be tolerated.

All incidents of discrimination, bullying, harassment or other inappropriate behaviour that shows lack of respect for others or leads to people feeling uncomfortable or threatened is prohibited and will be taken very seriously.

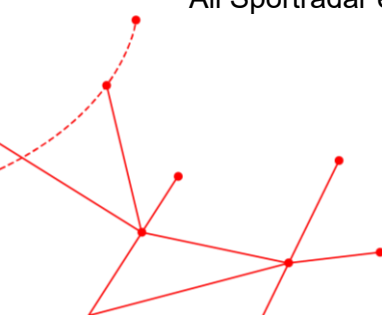
Sportradar will provide support to those affected by inappropriate behaviour and, where necessary, take appropriate disciplinary action against found perpetrator(s).

Managers are responsible for ensuring their team and direct reports adhere to the standards set out within this policy and will also manage their direct reports in a way that adheres to the standards set within this policy – when giving feedback and managing performance. Managers will be given training, as necessary, in order that they may perform this responsibility. Managers are responsible for facilitating a team environment which adheres to this policy and for providing feedback when team members fall short, and/or escalating breaches of this policy. Failure to properly manage direct reports in compliance with these standards may result in discipline up to, and including termination.

3. Standards and expectations

The highest standards of behaviour and conduct are expected of all Sportradar employees at all times, regardless of their position or seniority. It is the responsibility of everyone in Sportradar to uphold the principles of this policy and to ensure that individuals do not experience discrimination, harassment (including sexual harassment) or bullying. Such behaviour is strictly prohibited.

All Sportradar employees must:



- Be aware of their own behaviour and act in line with the core values of Sportradar at all times.
- Appreciate that behaviour that is acceptable and normal in one culture may be offensive in another and may contribute to misunderstandings.
- Respect the points of view of others, not seek to impose views on others, and promote an inclusive environment.
- Challenge or report behaviour that may disregard or exclude others, reporting contraventions in accordance with this policy or pursuant to any applicable country-specific policy.

4. What constitutes discrimination?

Discrimination is treating someone less favourably directly or indirectly (without lawful business justification) on the grounds of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, gender or sexual orientation, or other protected characteristics pursuant to applicable country, state or local laws.

For example, rejecting a job applicant because of their ethnicity or not considering workplace measures for a disabled employee, could be discrimination.

5. What constitutes Harassment?

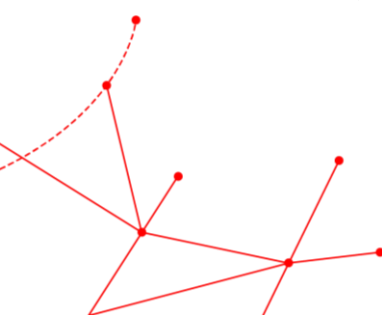
Harassment is any unwanted physical, verbal or non-verbal conduct that has the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading, humiliating or offensive environment for them. A single incident can amount to harassment.

It also includes treating someone less favourably because they have submitted or refused to submit to such behaviour in the past.

Unlawful harassment may involve conduct of a discriminatory nature, specifically conduct which is related to age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, gender or sexual orientation, or other protected characteristics pursuant to applicable country, state or local laws. However, harassment is unacceptable even if it does not fall within any of these categories.

Harassment may also occur where individuals are perceived to have the above characteristics or are associated with a person who has or is perceived to have these characteristics. Examples of harassment include:

- unwanted physical conduct, including touching, pinching, pushing and grabbing;
- continued suggestions for social activity after it has been made clear that such suggestions are unwelcome;
- sending or displaying material that is pornographic, inappropriate or that some people may find offensive (including e-mails, text messages, video clips and images sent by mobile phone or posted on the internet);
- Sexual harassment as described below;
- racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about



- a particular ethnic or religious group, gender, gender identity or gender expression;
- outing or threatening to out someone's sexual orientation;
- offensive or inappropriate e-mails, text messages or social media content; or
- mocking, mimicking or belittling a person's disability.

This is not an exhaustive list.

6. What constitutes Sexual Harassment?

Subject to locally applicable laws that legislate sexual harassment specifically, sexual harassment is unwanted conduct of a sexual nature, which has the purpose or effect of interfering with an individual's work performance; creating an intimidating, hostile, degrading, humiliating or offensive workplace environment; or violating an individual's dignity.

It includes making an unwanted or unwelcome sexual advance or solicitation, including where the individual making the advance or solicitation is in a position to give or deny a benefit to another individual or otherwise affect the position of the other individual at work.

Additional examples of sexual harassment include, but is not limited to:

- words, signs, jokes, pranks, and intimidation which are of a sexual nature;
- sharing sexual photos and videos;
- making sexual comments or innuendo;
- making inappropriate or unwanted touching or sexual gestures;
- unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
- invading personal space;
- offering opportunities, including promotions and raises, in exchange for romantic experiences or sexual contact (or inversely threatening a demotion for rejection of unwanted advances and behaviour).

This is not an exhaustive list.

7. What is Bullying?

Bullying is offensive, intimidating, malicious or insulting behaviour involving the misuse of power that can make a person feel vulnerable, upset, humiliated, undermined or threatened. Power does not always mean being in a position of authority, but can include both personal strength and the power to coerce through fear or intimidation.

Cyberbullying, which occurs through social media, instant messaging applications, or other online forums, is also covered by this section.

Examples of bullying include:

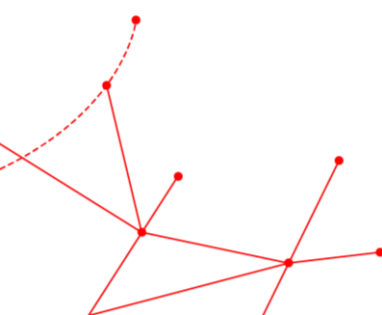
- a. physical or psychological threats;
- b. overbearing and intimidating levels of supervision;
- c. inappropriate derogatory remarks about someone's performance;
- d. spreading malicious rumours, or insulting someone;
- e. copying critical memos about someone to others who do not need to know;
- f. ridiculing or demeaning someone – picking on them or setting them up to fail;

g. exclusion or victimisation.

Legitimate, reasonable and constructive criticism of an employee's performance or behaviour, or reasonable instructions given to employees in the course of their employment, will not amount to bullying on their own.

8. Resolving Complaints

As a global company, we acknowledge that behaviour that is acceptable and normal in one culture may be offensive in another and may contribute to misunderstandings. Depending on the complaint (e.g., subject matter, location, Complainant preference), the complaint will be resolved in accordance with Sportradar's Grievance Policy or Whistleblower Policy. Any local employment law requirements in relation to discrimination, bullying and harassment complaints, over and above this policy and procedure, should also be applied, including as provided in any applicable country-specific policy. If in doubt, please seek advice from your local People Team representative.



Document Information:

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Approved by	Henry Thomas, Group Counsel, People & Places
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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.1	12.05.2021	Creation of the Policy	Carsten Koerl, CEO Alexander Gersh, CFO Ulrich Harmuth, CSO
V.1.1	08.08.2023	Ongoing regular update	Henry Thomas, Group Counsel, People & Places

