

Code of Business Conduct and Ethics

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Message from the CEO and the Chairman of the Board

Dear Colleagues,

As the global leader in its field, Sportradar Group AG and its subsidiaries (the “Company” or “Sportradar”), and all of its employees, officers and directors care deeply about doing the right thing. As Sportradar continues its trajectory of growth as the world’s most trusted sports technology company providing data and content to more than 1,000 companies in over 80 countries, we are committed to serving our customers, our partners and our shareholders with the highest degree of integrity. Our commitment to ethical conduct is foundational to our ability to occupy and maintain our unique position within the sports business ecosystem.

We place integrity, transparency and professionalism at the heart of all we do. To maintain the respect and trust of all of our stakeholders including our employees, and continue to drive Sportradar’s success, it is vital that we conduct our business in a manner that reflects our high standards of ethics and integrity. This means more than simply complying with the spirit and the letter of applicable laws and regulations; it means leading by example in the way that we do business and conduct ourselves.

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 adhering to our Code and ensuring 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 the law. 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 governmental 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 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 customers.

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, contractors and temporary employees 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, from time to time, to reflect 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 of 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 the Company.

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

All Sportradar’s compliance policies are available under: [Compliance Home - Confluence page](#)

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. If asked to participate in an investigation, your cooperation is required; failure to cooperate in good faith in an investigation may result in discipline. 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.

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 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 purporting to be acting on Sportradar's behalf to your supervisor, 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.** You may also report such violations directly on the Fair Play Line website, which is available 24 hours a day, 7 days a week, on the Internet at [FairPlay Line](#).

Reports may be made anonymously via the FairPlay 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 Fair Play Line will be provided to the 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 a disciplinary action.

Further explanations about the Fair Play Line website and how to submit a concern can be found at the link below, Sportradar's Global Whistleblowing Policy and in Policies and Procedures for Complaints Regarding Accounting, Internal Accounting Controls, Fraud or Auditing Matters:

[FairPlay Line](#)

[Global Whistleblowing Policy](#)

[Policies and Procedures for Complaints Regarding Accounting, Internal Accounting Controls, Fraud or Auditing Matters](#)

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 in 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 premise 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 Fair Play 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. The Global Diversity and Equality Policy can be consulted for specific 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 to 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-harassment, discrimination and bullying policies and procedures Sportradar has in place.

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

[Global 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 made to enable security personnel to be armed, in 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. For additional information regarding the Company's policies and procedures relating to compliance with anti-corruption laws and export and other trade controls laws, please see our Anti-Bribery and Corruption Policy and the Company's Global Trade Controls Policy.

[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 levels of commitment to addressing bribery, however, we remain committed to conducting our business fairly and ethically.

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

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

A few key points:

- Select third parties carefully to ensure they comply with the Sportradar Anti-Bribery and Corruption Policy;
- Keep accurate books and records at all times and monitor that funds are not being used for bribery or facilitation payments;
- Refuse any offer or request for an unlawful payment and report the incident as prescribed in this Code;
- Do not use gifts, meals, travel, and entertainment 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 we can be held liable for the actions of our representatives and other third parties who work on our behalf.

Link to Sportradar's Global Anti-Bribery and Anti-Corruption Policy:

[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 other applicable anti-corruption laws. These laws prohibit in particular the Company and its employees, directors, officers and third parties acting on behalf of the Company 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 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, Hospitality and Entertainment

Creating and maintaining good and high-quality professional relationships with our current and prospective clients and partners are essential to the success of our business. Modest gifts and entertainment among business partners can be an appropriate way to strengthen ties and build goodwill, but sometimes can create improper influence 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 entertainment must have a legitimate business purpose, be reasonable and modest in value and frequency, comply with local law and be accurately recorded. The Sportradar Global Gifts and Hospitality Policy contains detailed guidance for giving, receiving and disclosing gifts and/or entertainment. While the giving and receiving of gifts/hospitality is not prohibited in general, our 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, entertainment or other personal benefits to influence, induce or reward decisions or undermine the integrity of business relationships;
- Never offer or accept gifts or entertainment 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 entertainment that is "quid pro quo" (offered for something in return);
- Never offer a gift or entertainment 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.

Link to Sportradar's Global Gifts and Hospitality Policy:

[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 that receive any indication that a relationship or transaction with a customer 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., a positive hit against a denied parties list like the sanctions list 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 that 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.

Link to Sportradar's Global Trade Controls Policy:

[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 may 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 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 your activity outside of Sportradar impair or negatively affect the performance of your duties while working at Sportradar. Further, you are expected to devote your full efforts to the performance of your duties to Sportradar during your 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 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, entertainment, 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 to their Line Manager, People Team representative or the Chief Legal Officer.

If you are a director, executive officer or other principal financial officer, any such relationships 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 you to determine whether you have 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.

Link to Sportradar's Global Conflicts of Interest Policy:

[Global Conflicts 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 execute (i.e., 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 endeavor to deal fairly with our customers, 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 the 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 good reputation, but also to incur severe fines and penalties – civilly and criminally.

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 customers, 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 Global Head of Ethics and Compliance or the Chief Legal Officer.

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 the applicable legal provisions. We do not knowingly make false or misleading statements about our competitors, and neither do we publicly criticize them.

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 makes the best effort to prevent the Company, customers and employees, from either intentionally or unintentionally engaging or aiding in 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 accompanying process. The CDD process takes a risk-based approach to gain a better understanding of the industry and identify those customers or areas that may pose the greatest risk of money laundering and/or other illegal activities.

Link to Sportradar's Global Anti-Money Laundering and Counter-Terrorism Policy:

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

IV. Protection of our Brand

1. External Communication

Protecting our brand is very important and what we say publicly matters. We are committed to clear and truthful communications and also to protecting the reputation of the Company.

To ensure our communication is clear, truthful and consistent, you should not make public statements or issue material on the Company's behalf directly on any issue relating to the Company unless specifically authorized to do so by the Head of Communication and the Global Head of Ethics and Compliance. Furthermore, all enquiries from the media should be forwarded to the Communication Team.

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.** We encourage you to conduct yourself in a responsible, respectful, and 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, 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.

Link to Sportradar's Global Social Media Policy:

[Global Social Media Policy](#)

If in doubt, please speak to the Global Head of Ethics and Compliance or Chief Legal Officer at the earliest opportunity.

V. Protection of Information and Assets

1. Confidentiality

Information is one of our most valuable assets. We 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, if disclosed, is harmful to our clients, employees, our partners and us. Generally, we should consider any information we receive about the Company, our clients, and others as confidential, unless we know for certain that the information is public.

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
- 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 for further information and advice.

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. The Privacy Team has therefore taken all the necessary organizational and technical measures to comply with the EU General Data Protection Regulation (GDPR), 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 or create a new one, you should contact our Privacy Team who can provide you with further guidance.

Link to Sportradar's Global Privacy Manual:

[Global Privacy Manual](#)

This Global Privacy Manual summarizes all Sportradar's processes and policies regarding data protection and privacy. All Sportradar employees must be familiar with it.

3. Information Security Measures

At Sportradar we recognize that the protection of our customers' 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 customers, shareholders and regulators to ensure that all Sportradar's information assets are protected from unauthorized access, use, disclosure, alteration, destruction, and/or theft. We strongly believe in the strategy of defense in depth and 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 single 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 esteemed reputation, potential lawsuits, or even criminal prosecution. As a result, it is crucial for each team member to play an active role in upholding information security. Therefore, 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 diligently 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 adhere to relevant data privacy and markets laws and regulatory 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 every risk, including those related to cybersecurity field.

As a valued member 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. Together, we can protect our assets effectively and preserve our competitive advantage in the market.

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 Integrity Services to numerous sports federations and state authorities. Therefore, it is essential for Sportradar's business to maintain a high level of integrity, confidentiality and security and be seen to be doing so.

Consequently, employees are not permitted to bet, directly or indirectly through a third party, on any sport that appears on Sportradar's coverage list ([Betradar Coverage List](#)) or any other event or outright that Sportradar offers odds for.

Should an instance arise where you need to place a bet for a business purpose, you must first seek permission from your Unit Lead. The Unit Lead is required to send the request to the Corporate Compliance Team detailing the business case for the request. Requests will be assessed on a case-by-case basis by the Clearance Committee with no guarantee that your request will be approved.

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 is 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. Intellectual property created, developed or obtained by employees of Sportradar and related to his/her employment belongs to Sportradar and shall only be used 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 intellectual property 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) refuse to misuse others' patents, trade secrets or other proprietary information. Before you copy or share something provided by a third party or deploy new technology, always check with the Global Head of Ethics and Compliance or the Chief Legal Officer 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, up to and including termination of employment.

As a condition of your employment with Sportradar – whether by employment contract, consultancy agreement, subcontractor status, or otherwise – you acknowledge 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” can only trade 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.

Link to Sportradar’s Insider Trading Policy:

[Insider Trading Policy](#)

VI. Consequences of Non-compliance

Failure to comply with the provisions of this Code can 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 without delay.

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 (including without limitation any failure to report actual or suspected violations of the Code), which constitutes a breach of employee’s contractual obligations, may result in disciplinary actions 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 entire Code 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, 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