

Global Discrimination Policy

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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. This policy covers bullying, discrimination and harassment by employees, independent contractors, as well as third parties such as suppliers or visitors to any of our premises.

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

2. Scope and definitions

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 will be taken very seriously.

Sportradar will provide support to those affected by inappropriate behaviour and, where necessary, take appropriate disciplinary action.

Managers are responsible for ensuring their team and direct reports perform to the required standards. Managers will be given training in order that they may do so. They will provide regular feedback on performance, and are responsible for highlighting any shortfall and agreeing a plan to rectify the situation with the direct report in a fair, consistent, constructive and non-discriminatory manner.

3. Sportradar Standards

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 harassment.

- Sportradar expects all employees to challenge or report behaviour that may disregard or exclude others.
- It is the responsibility of all employees to be aware of their own behaviour.
- Remember, behaviour that is acceptable and normal in one culture may be offensive in another and may contribute to misunderstandings.
- All employees should respect the points of view of others and promote an inclusive environment.

- Behaviours or actions that contravene this policy should be reported in accordance with the Global Discrimination, Bullying and Harassment Procedure or pursuant to any applicable country- specific policy, and will be dealt with promptly, sensitively and, where possible, in the strictest confidence.

4. 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 of a sexual nature (sexual harassment), or it may be 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.

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 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);
- unwelcome sexual advances or suggestive behaviour (which the harasser may perceive as harmless);
- racist, sexist, homophobic or ageist jokes, or derogatory or stereotypical remarks about a particular ethnic or religious group or gender;
- outing or threatening to out someone as gay or lesbian;
- offensive e-mails, text messages or social media content; or
- mocking, mimicking or belittling a person's disability.

This is not an exhaustive list.

5. 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.

Examples of bullying include:

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

6. 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. 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.

Under certain circumstances, it may be possible to resolve complaints informally. If the employee feels they are experiencing harassment, discrimination or bullying, they may consider talking directly to the person whose behaviour is causing the concern. The offender may not know that his or her behaviour is unwelcome or upsetting. The offender should be informed of the behaviour that is found to be offensive, and that it should cease.

If the employee does not feel able to talk directly to the person or they would like advice about the situation, they should speak to their Line Manager or a People Partner for further advice.

If informal resolution is not possible or the matter is sufficiently serious that informal resolution is not appropriate, the employee should follow the formal procedure set out below and/or refer to the Sportradar's Global Grievance Policy and Procedures.

If the employee wishes to make a formal complaint about bullying or harassment, they should submit it in writing their line manager and send a copy to the People Partner in their local office, whose role is to achieve a solution wherever possible and to respect the confidentiality of all concerned. If the matter concerns the employees Line Manager, they should refer it to their line managers line manager.

The written complaint should set out full details of the conduct in question, including the name of the offender, the nature of the harassment or bullying, the date(s) and time(s) at which it occurred, the names of any witnesses and any action that has been taken so far to attempt to stop it from occurring.

The complaint will be investigated in a timely and confidential manner.

Following a formal investigation, if it is found that bullying, discrimination or harassment has occurred, this will be regarded as serious or gross misconduct and action will be taken under the Sportradar Global Disciplinary Policy and Procedure, which may result in a disciplinary sanction, up to and including dismissal.

If the offender is a third party such as a supplier or visitor, we will consider what action would be appropriate to deal with the problem. Whether or not the complaint is upheld, we will consider how best to manage any ongoing working relationship.

Any allegation of bullying and harassment is very serious. If it is found that an individual has intentionally raised a vexatious or malicious allegation against another person falsely, this may lead to disciplinary action up to and including dismissal for gross misconduct. Staff who make complaints or who participate in good faith in any investigation must not suffer any form of retaliation or victimisation as a result. Anyone found to have retaliated against or victimised someone in this way will be subject to disciplinary action.

If an employee wishes to raise a concern about suspected wrongdoing such as a violation of company policy/rules, law, regulation, or threat to public interest/national security, as well as fraud, and corruption, they should instead refer to the Sportradar Global Whistleblowing Policy.

Document Information:

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Approved by	Carsten Koerl, CEO Alexander Gersh, CFO Ulrich Harmuth, CSO
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