

# Global Anti-Bribery and Anti-Corruption Policy



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## 1. Statement

The reputation of Sportradar is, among others, based on the trust that our customers, shareholders and employees have in the integrity of Sportradar. Sportradar adheres to this goal in its Code of Conduct that contains a strict prohibition against any form of Corruption.

Therefore, Sportradar is committed to operating in an ethical manner and in compliance with local and international anti-corruption and anti-bribery laws and regulations, which includes the Foreign Corrupt Practices Act and the UK Bribery Act.

This includes the strict prohibition against the direct or indirect giving or receiving of improper payments or other benefits for purposes of obtaining an advantage.

Violating applicable anti-corruption laws potentially exposes the Sportradar Group, its employees and any third-party intermediaries (regardless of nationality or location of residence) to significant criminal and civil liability, fines and penalties.

## 2. Purpose

This Policy is intended to assist all members of the Sportradar community in making informed decisions and should be read in conjunction with other internal policies or procedures.

The purpose of this Policy is to ensure that all employees and third-parties acting on behalf of the Sportradar Group conduct business in an ethical manner and adhere to the requirements of all applicable anti-corruption and anti-bribery laws and best practices.

## 3. Scope

This Policy applies to all employees and relevant third parties of the Sportradar group, wherever located, with respect to their activities for or on behalf of Sportradar or otherwise in connection with Sportradar activities.

Sportradar is a global company; therefore, this Policy will apply in all countries and territories where Sportradar operates. When local standards do not match the provisions of this Policy, then the stricter standard shall apply.

## 4. Definitions:

For purposes of this Policy, the following definitions apply:

- ❖ **Corruption:** is any unlawful or improper behaviour that seeks to gain an advantage through illegitimate means. The term covers both corruption in the public or private sectors and active (paying) or passive (receiving) corruption. Bribery, abuse of power, extortion, fraud, collusion and embezzlement are typical forms of corruption.
- ❖ **Bribes:** a form of corruption that includes payments, offers or promises to pay, or authorization to pay or provide anything of value, made by or on behalf of Sportradar, directly or indirectly, to obtain an improper personal or business advantage. There is no minimum amount or threshold exception for bribes and it is irrelevant how this payment is called

- ❖ **Anything of value:** this must be interpreted broadly to include anything, monetary or non-monetary, that provides a benefit. This includes inter alia, vouchers, cash or cash equivalents, discounts, gifts, use of materials, facilities or equipment, transportation, promises of future employment, inside information, invitations to business meals, to sporting, cultural or other events.
- ❖ **Express payment:** a legitimate expedited form of financial transaction, for which one can receive an invoice or receipt so that the transaction can be duly registered in Sportradar's books and records.
- ❖ **Facilitation payment:** any small or nominal payment made to a government official, typically to speed up and/or secure the performance of a non-discretionary routine governmental action. Unlike express payments, facilitation payments often lack an official record of the transaction.
- ❖ **Kickback:** the return of a sum already paid or due as a reward for awarding further business.
- ❖ **Government official:** this includes anyone working in an official capacity for or on behalf of government-owned or controlled entities or agencies, political parties, and political candidates, or for a public international organization with government members. This may also include consultants who hold government positions, employees of companies owned or controlled by governments, political party officials or employees retained by government agencies.
- ❖ **Third party:** for the purpose of this Policy this means any individual or organisation Sportradar may come into contact with during the course of its business, and includes actual and potential clients, customers, suppliers, distributors, business contacts, agents, advisers, and government and public bodies, including their advisors, representatives and officials, politicians and political parties.

## 5. Requirements

### a. Bribery

Employees must not engage in any form of bribery, either directly or through any third party. This includes in particular:

- Offering, promising and authorizing the giving of money, or anything else of value, in order to secure an improper advantage is strictly prohibited;
- No employee may offer, give, promise or receive money, or anything else of value, in order to obtain an improper advantage.

Even the mere act of offering is prohibited, regardless of whether or not the item of value is actually accepted by the intended recipient.

Practical examples:

**Offering a bribe:** You offer a potential client tickets to a major sporting event, but only if they agree to do business with Sportradar. This would be an offence as you are making the offer to gain a commercial and contractual advantage. Sportradar may also be found to have committed an offence because the offer has been made to obtain business for Sportradar.

**Receiving a bribe:** A supplier gives your nephew a job, but makes it clear that in return they expect you to use your influence to ensure Sportradar continues to do business with them. It is an offence for a supplier to make such an offer. It would be an offence for you to accept the offer as you would be doing so to gain a personal advantage.

**Bribing a foreign official:** You arrange to pay an additional payment to a foreign official to speed up an administrative process. The offence of bribing a foreign public official has been committed as soon as the offer is made.

This Policy does not prohibit normal and appropriate gifts and hospitality (given and received) to or from third parties. Detailed information on the circumstances under which certain things of value may be provided can be found in the [Global Gifts and Hospitality Policy](#).

#### **b. Facilitation Payments**

Sportradar prohibits facilitation payments, irrespective of whether local law permits them.

Employees and third parties are prohibited from making facilitation payments on behalf of Sportradar. All employees must also avoid any activity that might lead to, or suggest, that a facilitation payment will be made or accepted by Sportradar.

Under exceptional circumstances, i.e. when an employee's safety is at risk, a facilitation payment may be permissible. When such payment has been made, an incident report must be submitted to the Compliance Team immediately.

Please note that facilitation payments are different from express payments used to speed up a process. Express payments are legitimate payments, for which one can receive an invoice or receipt so that the transaction can be duly registered in the Sportradar's books.

Practical examples of what is usually considered routine governmental action:

- Obtaining permits, licences or other official documents to qualify a person or entity to do business in a foreign country;
- Processing governmental papers, such as visas and work orders;
- Providing police protection, mail pick-up and delivery, or scheduling inspections;
- Providing telephone services, power and water, loading cargo or protecting goods from deterioration.

### **c. Political contributions**

Sportradar does not make donations, whether in cash or kind, in support of any political parties or candidates, as this can be perceived as an attempt to gain an improper business advantage.

For more details, refer to the [Global Political Donations and Charitable Contributions Policy](#).

### **d. Charitable contributions and sponsorships**

Sportradar only makes charitable donations that are legal under local laws and practices. Reasonable steps must be taken to verify that any such contribution does not constitute an illegal payment or a violation of this Policy.

All contributions must be authorised and documented via the [Social Contribution and Donation request form](#) to the Line Manager and the Compliance team.

## **6. Engaging Third-Parties**

Third parties are individuals or entities that are retained in connection with the operations of the Sportradar group. Sportradar can be held liable for the actions of a third party, who is acting for or on our behalf; therefore, third parties are held to the same level of responsibility as Sportradar employees. Third parties may not engage in any activity in which a Sportradar employee may not engage in when acting for or on Sportradar's behalf.

All third parties conducting business with, for or on behalf of Sportradar are required to act with the highest level of business, professional and integrity.

To minimize this risk, proper due diligence reviews must be performed before entering into a business relationship with a third party to verify that the third party operates in an ethical and legally compliant manner.

When deemed appropriate or necessary, this Policy will be communicated to any acting third party along with the appropriate contractual arrangements to ensure continued compliance.

## **7. New Business and Joint Ventures**

Before entering into an agreement for new business or entering into a joint venture, an appropriate level of anti-bribery due diligence must be completed. In addition, a remediation plan should be developed and implemented to address identified issues.

## **8. Books and Records**

Books and records include accounts, invoices, correspondence, papers, CDs, tapes, memoranda and any other document or transcribed information of any type.

Keeping detailed and accurate books and records is a crucial component of Sportradar's anti-corruption controls.

The following principles must always be followed:

- Secret, unrecorded or unreported transactions are prohibited;
- All expenses must be accurately accounted and include appropriate supporting documentation and be promptly entered into company records;
- False or misleading entries or invoices are prohibited and will result in disciplinary actions;
- Undisclosed or unrecorded payments or assets are also strictly prohibited;
- No accounts must be kept "off-book" to facilitate or conceal improper payments;
- Expense records are subject to managerial or internal review;
- No unapproved or undocumented cash payments may be made for any kind of services for the benefit of Sportradar. Please note that maintaining accurate books and records, and adequate internal accounting controls is required under many anti-bribery laws and is an international best practice for preventing improper behaviour.

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## **9. Discipline**

All employees and third parties are responsible for the success of this Policy and have the responsibility to read, understand, and comply with this Policy.

Employees should at all times, avoid any activity that might lead to, or suggest, a breach of this Policy.

Any employee who violates this Policy may be subject to disciplinary action, up to and including dismissal, suspension, or other actions deemed appropriate, in accordance with applicable laws and company policies.

Third parties, acting on behalf of Sportradar, who violate this Policy, may be subject to termination of all relationships with the Sportradar group. Violations of this Policy may also result in civil and criminal penalties from multiple jurisdictions.

Investigations of employees suspected of violating this Policy or applicable laws will be handled jointly by the Compliance team and Human Resources Department. These departments will take the necessary actions to obtain the facts and determine what disciplinary action to take with respect to the employee in question in accordance with the Global Disciplinary Policy and Procedure.

## **10. Reporting of Breaches and Protection**

The prevention and reporting of any form of bribery and corruption is the responsibility of all employees.

Employees should notify the Compliance team immediately if they are offered a bribe, asked to make one, or suspect that it may happen in the immediate future. The reporting of potential breaches can be reported verbally, in writing or per telephone. Every indication will be investigated. The anonymity of the informants is guaranteed.

In the event that such employee does not feel comfortable in reporting directly to Compliance, they should refer to and follow Sportradar's Whistleblowing Policy in making their report.

Further explanations about the Whistleblowing service and how to submit a concern can be found under the link below and in the [Global Whistleblowing Policy](#).

[https://secure.ethicspoint.eu/domain/en/report\\_custom.asp?clientid=105969](https://secure.ethicspoint.eu/domain/en/report_custom.asp?clientid=105969)

Employees who refuse to take part in bribery or corruption or report in good faith their suspicion that an actual or potential bribe, or other corruption offense, has taken place or may take place will be protected from retaliation. Retaliation includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

Victimisation of a person reporting a suspected breach of this Policy shall itself be treated as a breach of this Policy and subject to disciplinary action.

## **11. Awareness and training**

Sportradar requires that all employees must complete training on this Policy. Existing employees will receive relevant updated training on this Policy regularly.

Information on this Policy will form part of the induction process when employees begin employment with Sportradar.

In addition, the Compliance team can provide ad hoc face-to-face training sessions to certain employees or divisions when requested or after an issue occurs.

## **12. Monitoring and Review**

The Compliance team will monitor and review compliance with this Policy through regular Compliance reviews and spot checks.

This Policy will undergo a review every two years, with potential amendments made as necessary to ensure compliance with all applicable rules, laws, regulations, and international treaties. The



Compliance Team will oversee this process through regular compliance reviews and periodic assessments. Employees and third parties are responsible for understanding or seeking clarification of any rules outlined in this document and for familiarizing themselves with the most current version of this Policy.

### 13. Deviations

No exemptions from this Policy can be granted unless there are exceptional circumstances. All requests for exemptions must be made in writing to the Compliance team.

The Compliance team must assess and decide on each request individually. Exemptions must be duly logged and documented.

#### Document Information:

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<b>Contact Person</b>	<b>Xavier Varin, Head of Compliance (x.varin@sportradar.com)</b>
<b>Approved by</b>	<b>Xavier Varin, Global Head of Ethics and Compliance</b>
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<b>Area of application</b>	<b>All Sportradar Group companies</b>

#### Amendments or changes:

<b>Version</b>	<b>Date</b>	<b>Reason(s) for and extent of changes</b>	<b>Approved by</b>
<b>V.1</b>	<b>12.05.2021</b>	<b>Creation of the Policy</b>	<b>Carsten Koerl, CEO Alex Gersh, CFO Ulrich Harmuth, CSO</b>
<b>V.2</b>	<b>08.12.2023</b>	<b>Ongoing regular update</b>	<b>Xavier Varin, Global Head of Ethics and Compliance</b>

## Annex 1 – Potential Red Flags

The following is a non-exhaustive list of possible red flags that may arise during the course of the business and which may raise concerns under various anti-bribery and anti-corruption laws. The list is not intended to be exhaustive and is for illustrative purposes only.

If you encounter any of these red flags, you must report them promptly to the Compliance team.

- You become aware that a third party engages in, or has been accused of engaging in, improper business practices;
- You learn that a third party has a reputation for paying bribes, or requiring that bribes are paid to them, or has a reputation for having a "special relationship" with foreign government officials;
- A third party insists on receiving a commission or fee payment before committing to sign up to a contract, or carrying out a government function or process for Sportradar;
- A third party requests payment in cash and/or refuses to sign a formal commission or fee agreement, or to provide an invoice or receipt for a payment made;
- A third party requests an unexpected additional fee or commission to "facilitate" a service;
- A third party demands lavish entertainment or gifts before commencing or continuing contractual negotiations or provision of services;
- You are offered an unusually generous gift or offered lavish hospitality by a third party;
- A third party requests that a payment is made to "overlook" potential legal violations;
- A third party requests that you provide employment or some other advantage to a friend or relative;
- A third party insists on the use of side letters or refuses to put terms agreed in writing;
- You notice that you have been invoiced for a commission or fee payment that appears large given the service stated to have been provided;
- You ask a public official to provide consultancy services and they request a payment, which you consider, is unreasonable and which does not reflect the fair market value of the services to be provided;
- Contracts with advisors that include only vaguely described services;
- Advisors who are normally in a different line of business than that for which they have been engaged;
- Business partners related to or closely associated with foreign officials;

- Business partners who became part of the transaction at the express request or insistence of a foreign official;
- Business partners who are merely a shell company incorporated in an offshore jurisdiction;
- Business partners requesting payments to offshore bank accounts.