

10976

Modern Slavery
Transparency Statement
2021-2022





This Modern Slavery Statement (this “Statement”) is made by Genius Sports Limited (“Genius”, “we”, or the “Company”) (GENI:NYSE) collectively with its group companies, in accordance with Section 54 of the UK Modern Slavery Act 2015 (2015 c.30) (the “UK Act”) and the Australian Modern Slavery Act 2018 (Cth) (the “Australian Act”) (collectively the “Acts”). This Statement is subject to approval by the Genius Board of Directors and adoption by its subsidiary companies operating in England and Australia.

Prevention of Modern Slavery

We believe in acting with integrity and treating everyone who works at or with Genius with dignity and respect.

These values apply across our global operations and extend to the manner in which we interact with suppliers, partners and customers.

We take responsibility for creating a working environment that promotes and integrates these values into our strategic and commercial goals. We do not tolerate any form of slavery, human trafficking, forced labour or other similar work environments or practices.

We are committed to maintaining, monitoring and improving the efficacy of the processes and procedures in place to mitigate the risk of modern slavery within our supply chains and our operations..

About Genius Sports



Our Business

Genius is the official data, technology and broadcast partner that powers the global ecosystem connecting sports, betting and media. Our technology is used in over 150 countries worldwide, creating highly immersive products that enrich fan experiences for the entire sports industry.

We are the trusted partner to over 400 sports organisations, including many of the world's largest leagues and federations, such as:



Genius is uniquely positioned to support our partners through cutting-edge technology, scale and global reach. Our innovative use of big data, computer vision, machine learning, and augmented reality, connects the entire sports ecosystem, from the rights holder all the way through to the fan.

Our Values

We collaborate across borders to succeed and to deliver top performance for ourselves, our teams and our business. Our culture values integrity, accountability and collaboration. These values apply across the entire Genius ecosystem. It is our responsibility to create an environment that promotes these ideals whilst achieving our strategic and commercial goals.

We do not tolerate modern slavery in our operations or within our supply chains. Any violation of the dignity and basic human rights of those who earn a living within our operational community is unacceptable. We take the steps outlined below to identify risks of modern slavery and actively prevent modern slavery.

Our Corporate Structure & Supply Chain

Genius Sports Limited ("GSL") is incorporated in the States of Guernsey, operates its head office in London, United Kingdom and is listed on the New York Stock Exchange (NYSE) as a foreign private issuer. As of the date of this Statement, GSL is the ultimate parent entity for Genius. Genius conducts its business in the UK through the group entities, as provided on page 11, including: Genius Sports Group Limited (a company registered in England and Wales with Company Number 09706742 with Registered Office at 10 Bloomsbury Way, London, WC1A 2SL).

Close to 20% of our employees are based in UK with others operating in over 150 countries and in offices in Bologna, Lausanne, Los Angeles, Manchester, Melbourne, Medellín, Miami, New York, Salerno, Shanghai, Singapore, Sofia, Sydney, Tallinn, Winter Springs and Zaporizhzhya among others. Genius Sports Limited is a company incorporated in Guernsey and is listed on the New York Stock Exchange (NYSE).



Genius is one of the market-leading business-to-business (B2B) providers of technology and services to the sports, sports wagering and sports media industries. We sit at the heart of the global sports betting ecosystem where it has deep, critical relationships with over 400 sports leagues and federations, 150 sportsbooks and over 100 marketing customers in 150 countries worldwide. Genius provides the following services to its partners globally:



Sports Leagues & Federations

Genius provides the technology infrastructure for the collection, integration and distribution of live data that is essential both to running a league's operations and to growing their profile and revenue streams. Genius also works alongside leagues to protect the integrity of their competitions from the threat of match-fixing through global bet monitoring technology, online and offline education services, and consultancy services including integrity audits and investigations.



Sportsbooks

Genius' technology, content and services allow sportsbook operators to outsource selected core, but resource-heavy, functions necessary to run their business. This includes the collection of live sports data and video streams, odds making, risk management and player marketing.



Brands & Media

Genius helps a wide variety of brands, both from the gaming and non-gaming sectors, to engage and monetise sports fans with digital content, data-driven marketing campaigns and sponsorship. The company also works with media, including both broadcasters and publishers, to provide live content, such as data and video feeds, and other fan engagement tools designed to drive revenues.

Our Supply Chain

Our primary operations are service based products, which rely on the supply of communication and technology services, back office resources and IT equipment. The supply chains that provide us with these resources is deemed low risk for modern slavery. We have identified possible risks relating to cleaning services and some camera hardware provision, and Genius therefore has implemented a supplier risk management system and programme for all suppliers, but with a deep-dive focus specifically targeted at these areas.

As a function of our service provision, we utilise a global supply chain to source the materials required to build and install cameras and related IT hardware. In 2021, our supply of product parts increased due to the acquisition of Second Spectrum, Inc., a software company that is the Official Tracking Provider for the Premier League, National Basketball Association (NBA), and Major League Soccer (MLS), using advanced AI capabilities and computer vision technology to capture precise ball and player location-based data.





Prevention of Modern Slavery: Relevant Procedures, Practices and Policies

In accordance with the Acts, this Statement sets out Genius' risks, and action taken to prevent and mitigate risks of, modern slavery and human trafficking within its own operations and supply chain. This Modern Slavery Transparency Statement provides an annual review, and update from our Modern Slavery Statement 2020-2021.

Our Policies

In 2021, we updated a number of company policies and corresponding procedures, which uphold our values as a company and reduce the risk of modern slavery. Many of these policies were subject to review by our Board of Directors. These policies include:

Responsible & Ethical Sourcing Policy

This policy sets the standard that all suppliers and business partners of Genius have to adhere to, ensuring sourcing is carried out in an ethical, social and environmentally responsible manner.

Supplier Code of Conduct

This policy provides the minimum standard Genius expects from our suppliers and business partners.

Whistleblowing Policy

This policy sets out the principals and process to report any suspected wrongdoing and the process of investigation that is followed.

Code of Conduct

This is a company policy that sets out Genius' principles and ethos, standards and moral and ethical expectations that employees and third parties are held to when interacting with Genius.

Game Plan

This policy is the strategy of Genius and provides internal and external parties with insight into the objectives of the company and how we hope to fulfil these aims in both the short term and long term.



New Supplier Onboarding

Genius requires all new suppliers to participate in a strict pre-screening and onboarding process. This process begins with completion of a standardised form for disclosure of key details pertaining to each supplier's business practices and processes.

In 2021, we added the step of requiring suppliers to review and voluntarily agree to our Ethical Sourcing Policy during the pre-screening process. The policy outlines the working conditions that we expect all suppliers to observe, at a minimum.

Over the past year, we have invested considerable attention into the depth and quality of our on-boarding process to minimise the risk of working with suppliers/vendors who fail to uphold our human rights or ethical standards.

To ensure we only engage with suppliers and contractors who comply with our zero-tolerance approach to modern slavery and forced labour:

- All incoming suppliers complete an assessment, regardless of what level of risk they are determined to be.
- The compulsory assessment includes a 'Labour & Ethical Standards' section.
- Suppliers are asked about the following policies, processes and controls:
 - Steps taken to assess and manage the risk of modern slavery and forced labour.
 - To confirm compliance with the annual reporting requirements per Section 54.
 - To provide a copy of an anti-slavery policy or statement.
 - To detail their own screening on prospective suppliers or sub-contractors.
 - To detail how they manage allegations of modern slavery or sub-standard working conditions.
- A 'Third Party Risk Register' is populated based on suppliers' responses and risks flagged.
- The Procurement Committee decide whether the supplier can be onboarded based on its residual risk level.
- High-risk suppliers are re-assessed on an annual basis.

Ongoing Audits and Due Diligence Updates

We undertake additional due diligence reviews throughout the lifecycle of our supplier relationship and look to expanding our existing supplier due diligence procedures in the coming years. In addition, in 2021, we formalised our annual review of high-risk suppliers via desktop and interview audit. Additionally, we conduct various educational sessions internally for our own team. We also undertake additional oversight and due diligence processes for existing suppliers.

In 2021, we undertook the following actions to mitigate risks of forced labour or modern slavery within our own operations and with respect to suppliers:

- Annual review of high-risk suppliers through audits of suppliers who are deemed to be at risk due to the goods or service being provided, or selected on an ad-hoc basis.
- Training conducted for our 'Workforce Incident Management team' of how to identify and flag risks.
- 'Worker Risk Questionnaire' developed.
- Our Whistleblowing procedures were refreshed and an externally operated hotline was implemented.
- A 'Modern Slavery Risk Assessment' was undertaken by key individuals in Procurement. This tool is to help assess a high-risk supplier prior to onboarding, what to look for in terms of site, labour and sector risks.
- Mapped our procure-to-pay end-to-end process and identifying third-party risks, especially regarding labour.

Further Measures to Mitigate Risks in Our Supply Chain

Following the implementation of our vendor risk and triage process in 2020, we undertook a number of further measures in 2021 to ensure that we are effectively monitoring the labour and ethical standards of our suppliers. These include:

- Running a deep-dive supplier assessment/audit on high-risk suppliers.
- We developed the 'Labour & Ethical Standards' section of our supplier due diligence assessments and ran this for 304 vendors.
- We mapped the source-to-pay process end to end including escalation pathways.
- The development of a dedicated due diligence process for our camera hardware and assembly operations.
- The introduction of a new anonymous external whistleblowing portal.
- The formation an 'Workforce Incident Management' team and development of our training materials.
- The continued review of our cleaning providers approach to the COVID-19 global pandemic, to understand the provisions for: the continuation of employment, health & safety guidance, PPE and sickness management etc. to ensure suppliers were treating their staff appropriately in consideration of the risk to personal health presented by the pandemic.

Training

All staff involved in procuring goods or services at Genius receive modern slavery awareness training.

Additionally, we provide guidance on how to ensure the safety and welfare of any potential victim(s) and how to report exploitation to the relevant enforcement authorities, informing internal stakeholders and what remedies are available to victim(s), members of staff who participate in the Workforce Incident Management Team, Facilities Team and the Procurement Team.

Our Modern Slavery Risk Assessments 2022

We consider the risk of modern slavery being present in our supply chain to be relatively low. We have identified possible risks relating to cleaning services and some camera hardware provision, and Genius therefore has implemented a supplier risk management system and programme for all suppliers, but with a deep-dive focus specifically targeted at these areas.

Escalation and Response Management

We continually assess risks with respect to our processes or those of our suppliers present. Our risk assessment process is resourced to escalate and respond to risks or perceived risks, and includes the use of a:

- signage that raises awareness of the signs of modern slavery;
- designated supplier 'touchpoint' individuals with defined responsibilities;
- directions on how to spot and report any perceived issues with safety, welfare or wrongful treatment;
- details on how to flag and escalate concerns and the relevant enforcement authorities;
- access to an allocated Workforce Incident Management Team, which includes specified roles and responsibilities within the team;

- a discovery and notification response plan; defined investigation and
- reporting/escalation steps;
- internal and external stakeholder notification processes; and
- remedy processes and post-incident review guidance.

Additionally we have certain protocols to ensure risks are identified and escalated clearly and appropriately, by utilising tools and procedures, such as:

- a 'Workplace Incident Report' template.
- a process for escalation of risks from the 'Third Party Risk Register' to the Risk Committee (and subsequently Board Committee), which includes the Chief Risk Officer and Chief Governance & Compliance Officer.



Our Team

We have a dedicated team which consists of representatives from the following departments:



Governance & Compliance
Jackie Grech
Chief Governance & Compliance Officer



Risk
Sophie Powys
Chief Risk Officer



Procurement
Helen Taylor
Business Operations Director

2023 and Beyond

We are aware and understand that modern slavery is a widespread and complicated issue which cannot be eradicated through a policy alone. It is because of this that we will continue to further develop our efforts to eliminate modern slavery and human trafficking.

In accordance with Government guidance, we will continue to assess and build ways to quantify our approach's effectiveness.

This statement has been approved by the Company's Board of Directors ("Board") as of 8 September 2022 and adopted by the relevant subsidiary entities operating in Australia and the United Kingdom.



Appendix

List of subsidiaries of Genius Sports Ltd

International subsidiaries:

Bestbetting Ltd
Boolabus Ltd
Connextra Ltd
FanHub Media Development
FanHub Media USA LLC
Genius Sports ANZ Pty Ltd
Genius Sports Asia Pte Ltd
Genius Sports Canada Corporation
Genius Sports CH SARL
Genius Sports Danmark ApS
Genius Sports Esportivos Ltd
Genius Sports Italy SRL
Genius Sports LT
Genius Sports Media Inc.
Genius Sports Network ApS
Genius Sports Services Colombia S.A.S
Genius Sports Services Eesti Ou
Genius Sports Services EOOD
Genius Sports SS Holdings
Genius Sports SS LLC
Oppia Performance BVBA
Second Spectrum China Ltd
Second Spectrum HK Ltd
Second Spectrum SARL
Spirable Inc
Sportcast Inc.

Australian subsidiaries:

Betgenius ANZ Pty Ltd
FanHub Media Direct Pty Ltd
FanHub Media Holdings Pty Ltd
FanHub Media Trading Pty Ltd
Genius Sports ANZ Pty Ltd

United Kingdom subsidiaries:

Fanhub Media UK Ltd
Genius Sports Group Ltd
Genius Sports Holdings Ltd
Genius Sports Media Ltd
Genius Sports Services Ltd
Genius Sports Technologies Ltd
Genius Sports UK Ltd
Photospire Ltd
Second Spectrum UK Ltd
Spirable Ltd
Sport Integrity Monitor

