



Modern Slavery Transparency Statement

2022-2023

This Modern Slavery Statement (this “Statement”) has been published by Genius Sports Limited (“Genius”, the “Company”, “we”) (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”). This Statement has been adopted by Genius’ subsidiary companies. This Statement is subject to approval by the Genius Sports Board of Directors (“Board”) and adoption by its subsidiary companies operating in the United Kingdom and Australia.



Our Principles

Genius Sports has a zero-tolerance policy to any form of slavery, human trafficking, forced labour or other similar work environments or practices.

We promote safe and fair working conditions for workers and respect the human rights of all individuals. We are committed to ensuring every individual is treated with dignity and respect, and foster a culture of integrity and accountability to create an environment that upholds this, alongside our commercial objectives.

We seek to have a positive impact upon the locations in which we operate and recognise that our choices can have significant effects upon local people, organisations and the wider environment. Through the maintenance and regular review of our Company policies, processes and practices, we seek to identify, prevent and mitigate the risk of modern slavery within our operations and supply chains.



Genius Sports is the official data, technology and broadcast partner at the centre of the global network connecting sports, betting and media.

Our technology powers the future of sports all around the world, enabling leagues to take control of their data and brands to create immersive fan experiences.

We sit at the heart of the global sports betting ecosystem, where our leading product offerings, strong technology platform, data integrity, and established brand have made us the partner of choice to over 400 sports organisations – including many of the world’s largest leagues and federations such as the NFL, EPL, FIBA, NCAA, NASCAR, AFA and Liga MX.

About

Genius Sports

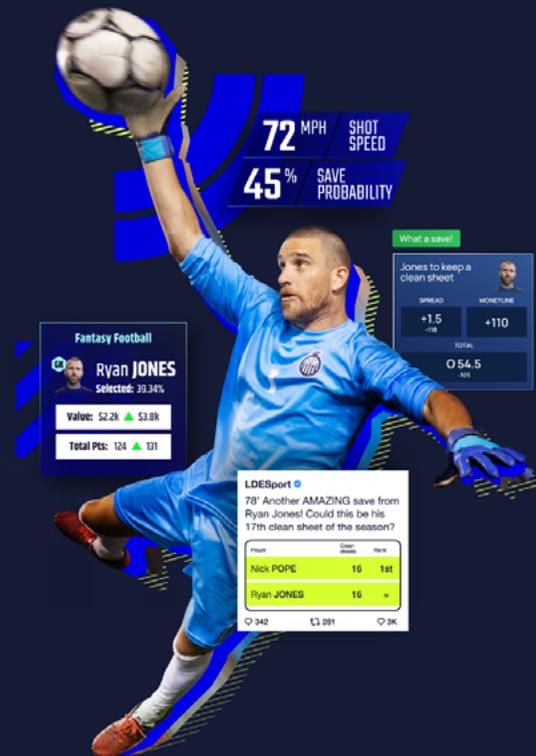


The scope of our products bridges the entire sports data journey, from intuitive applications that enable real-time data capture, to the creation and provision of accurate in-game betting odds and digital content that help our partners create engaging experiences for the ultimate end-user (who are primarily sports fans).

Our Mission

Our mission is to champion a more sustainable sporting ecosystem with the highest-quality data, content and products that organise, optimise and enrich sports experiences.

As a business, we work collaboratively and seamlessly across borders every day to generate value for our Company, our staff and our stakeholders. We empower our colleagues to act smarter, faster and fairer and uphold respectful behaviour and ethical business practices through our Company values, procedures and policies.



Organisational Structure & Supply Chain

Genius Sports Limited (“GSL”) is incorporated in the States of Guernsey, operates its head office in London, United Kingdom (UK) 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 Sports. Genius conducts its business in the UK through the group entities, as provided on page 9, including: Genius Sports Group Limited (a company registered in England and Wales with Company Number 09706742, with Registered Office at 27 Soho Square, London, W1D 3QR, England).

Genius Offices

Genius has offices based in Bulgaria, Colombia, Estonia, Italy, Shanghai, Singapore, Switzerland, Ukraine, the United Kingdom and the United States. We operate in over 150 countries, playing a role in each of our local communities and powering the future of sports worldwide.

Services

Genius is one of the leading business-to-business (B2B) providers of scalable, technology-led products and services to the sports, sports betting and sports media industries.

Our technology helps capture every run, kick, hit and throw to help over 600 sports organisations around the world create game-changing and immersive fan experiences.





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. Our chosen suppliers and the supply chains that deliver these resources for us are regarded as a low risk for modern slavery. We have assessed and located potential risks, namely those linked to cleaning services and implementation of some in-venue equipment. As a result of this, Genius Sports has introduced a third-party risk management system and programme for all suppliers, but with a specific and extensive focus of these areas.

As a consequence of our service provision, we employ a supply chain around the world that works to locate the required resources to construct, manufacture and install the in-venue equipment and other related IT hardware required. 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, English Football League, and Danish Superliga, using advanced AI capabilities and computer vision technology to capture precise ball and player location-based data.

The Prevention of Modern Slavery: Practices, Policies and Procedures



sourcing is carried out in an ethical, social and environmentally responsible manner.

Supplier Code of Conduct

This Policy notes the minimum standard Genius requires from our suppliers and business partners.

Sustainable Procurement Policy Statement

Our Sustainable Procurement Policy Statement outlines how we and our supply chain will influence the procurement choices of goods, works and services to reduce consumption of primary resources, mitigate impacts on the environment, improve resource efficiency and transparency, and improve the lives of those in the locations in which we operate. This includes all areas of commerce, as well as the conditions of employment, contracting and risk analysis.

Whistleblowing Policy

Our Whistleblowing Policy sets an effective, confidential and easy to follow process to report concerns and any suspected issues with regards to the behaviour of the Company. This Policy also details how the investigation process is carried out and the protections provided to a whistleblower.

We have a number of Company policies and procedures that uphold our Company values and ethical business practices.

Code of Conduct

Our Code of Conduct is a Company policy that sets out Genius' principles, and moral and ethical expectations that all employees and third parties are to comply with when working with and for Genius.

Procurement Policy

In 2022, we launched our global Procurement Policy. This Policy includes our procurement principles, processes and ethical standards when securing goods and services on behalf of the Company.

Responsible & Ethical Sourcing Policy

This Policy documents the standard that all suppliers and business partners of Genius have to adhere to, ensuring

The Onboarding of New Suppliers

Genius requires all new suppliers to participate in a strict screening process as a mandatory part of our supplier onboarding process. This process includes disclosure of information on each suppliers' business practices and processes.

In 2022, we continued to implement our Responsible & Ethical Sourcing Policy across our supplier base. We continued to ensure all new suppliers were onboarded subject to our Procurement Policy and Sustainable Procurement Policy Statement. During the process, if a supplier was identified as having labour or ethical standards that were categorised as a higher risk, we ran a further enhanced due diligence process. This covered 7% of the total reviewed suppliers.

Our Responsible & Ethical Sourcing Policy has been maintained and continues to outline the minimum standard we expect all suppliers to observe at the most basic level. We have continued to invest significant consideration into the depth and quality of our onboarding process to decrease the risk of contracting with suppliers who do not maintain human rights or ethical standards.

As an assurance that we only contract with suppliers and contractors who comply with our zero-tolerance approach to modern slavery and forced labour, we undertake the following steps as part of our process:

- /// All new suppliers that need to be onboarded have an obligation to complete an assessment, which includes a section on 'Labour & Ethical Standards'. This assessment has to be completed irrespective of the risk level that they are perceived to be or actually are.
- /// 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 affirm they comply with the annual reporting requirements as per Section 54 of the UK Modern Slavery Act 2015.
 - /// To provide a copy of their Anti-Slavery Policy or Statement.
 - /// To provide further details on their own screening process as part of their onboarding and general assessment for prospective suppliers or sub-contractors.
 - /// To explain their process of governing claims of modern slavery or sub-standard working conditions across their business.
- /// Risks are populated and triaged in a third-party risk management platform and escalated to our Risk and Compliance functions as required.
- /// The Procurement Committee presides over these matters and determines whether the supplier can be onboarded based on its residual risk level.

Ongoing Audits and Due Diligence Updates

Throughout the course of our supplier relationship, we undertake supplementary due diligence reviews. Additionally, we administer various educational sessions for our own team internally. We train various buyer touchpoints teams at Genius in identifying, reporting and escalating any signs of breaches of labour and ethical standards through the use of our internal processes, whistleblowing portal, and/or external bodies.

We continue to take the following actions to mitigate risks of forced labour or modern slavery within our own operations and with respect to suppliers:

- // We undertake an annual review of high-risk suppliers through auditing suppliers who are deemed to be at risk due to the goods or service being provided, or selected on an ad-hoc basis.
- // We continue to conduct training for our 'Workforce Incident Management Team' of how to identify and flag risks.
- // We circulate our 'Worker Risk Questionnaire'.
- // Our Whistleblowing procedures are reviewed and refreshed where necessary.
- // A 'Modern Slavery Risk Assessment' continues to be undertaken by key individuals in Procurement. This assessment is a tool that is used to evaluate a high-risk supplier before the onboarding process begins. It consists of what to look for in terms of site, labour and sector risks.
- // We map our process for procure-to-pay end-to-end and the identification of third-party risks, in particular, those relating to labour.



Further Measures to Mitigate Risks in Our Supply Chain

In 2022-2023, we continued to mature our approach to identifying, assessing and mitigating supplier risk. These steps included:

- // We launched our global Procurement Policy which sets our supplier risk principles and relevant enforcement measures. The Policy ensures standards are upheld per our Sustainable Procurement Statement & Responsible & Ethical Sourcing Policy.
- // We undertook careful analysis assessments on 7% of our supplier base who were identified as posing a higher labour or ethical standards risk.
- // We continued to assess all new suppliers' compliance in line with our labour and ethical standards.
- // We specifically focussed on our global in-venue equipment supply chain.
- // We maintained our anonymous Whistleblowing Portal.
- // Our global Workforce Incident Management Team had refresher training and all new members were onboarded via the programme.

Training

All staff that participate in the procurement of goods or services at Genius receive modern slavery awareness training.

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

Our Modern Slavery Risk Assessments 2023

We consider the risk of modern slavery to be relatively low in our supply chain. The potential risks that have been identified continue to be related to the cleaning services and some camera hardware provision. As a consequence of this, Genius has implemented a supplier risk management system and programme for all suppliers, but with a specific and extensive focus that has been targeted at these areas.

Escalation and Response Management

We frequently assess the risks relating to our processes or those that our suppliers present. Our risk assessment process is resourced to escalate and respond to risks or perceived risks, and includes the use of:

- // A Workforce Incident Report Template.
- // A risk escalation process from the third-party risk platform to the Risk Management Steering Group (and subsequently the Audit Committee). This process includes the Chief Risk Officer and Chief Legal Officer.
- // Signage that raises awareness of any indication of modern slavery.
- // Designated supplier 'touchpoint' individuals with defined responsibilities.
- // Instructions on the process relating to detection and reporting any perceived issues with safety, welfare or wrongful treatment.
- // Information on how to highlight and escalate concerns, including details of 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.
- // A notification process for internal and external stakeholders.
- // Remedy processes and post-incident review guidance.

Our Workforce Incident Management Team, which is comprised of our Procurement, IT and Facilities functions, has been trained and equipped with:

- // defined roles and responsibilities;
- // a discovery or notification response plan;
- // investigation, reporting and escalation steps;
- // our internal and external stakeholder notification process; and
- // our remedy process and post-incident review guidance.



Our Team

We have a dedicated team that involves the below representatives from the following functions:

Business Operations & Procurement

Helen Taylor
Transformation & PMO Director



Risk

Sophie Powys
Chief Risk Officer



Legal

Tom Russell
Chief Legal Officer



Looking to the Future

Genius Sports will continue to work to eliminate modern slavery and human trafficking. We are aware that a policy will not solely eliminate such a complex issue. As such, we are committed to continually improving our internal systems to identify, manage and mitigate the risks of modern slavery throughout our operations and supply chains. In line with Government guidance, Genius will continue to review, evaluate and foster ways to measure the effectiveness of our approach to this issue.

This statement has been approved by the Company's Board of Directors ("Board") as of April 2024 and adopted by the relevant subsidiary entities operating in Australia and the United Kingdom.



Appendix

List of Subsidiaries of Genius Sports Ltd

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

International subsidiaries:

Bestbetting Ltd
Boolabus Ltd
CFL Ventures
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 LTDA
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
Genius Sports WE SUB LLC
Second Spectrum China Ltd
Second Spectrum HK Ltd
Second Spectrum SARL
Spirable Inc
Sportcast Inc.