



Modern Slavery

Transparency Statement

2023-2024

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.



Preventing Modern Slavery

Genius Sports respects and upholds the human rights and freedoms of all individuals. We do not tolerate any form of slavery, human trafficking, forced labour, or other similar work environments or practices.

We promote the highest standards of integrity across all of our business dealings and are committed to achieving our strategic and commercial goals in an ethical and responsible manner. Through a culture of openness and accountability, we foster transparent business practices to combat the risk of modern slavery and ensure every individual is treated with dignity and respect.

This Statement outlines our ongoing commitment and efforts to identify, prevent and address the risk of modern slavery within our business operations and supply chain. We are committed to continuously improving our policies, processes and practices to ensure that human rights remain respected and protected at every level of our operations.



About

Genius Sports

Genius Sports 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.

Genius is uniquely positioned through cutting-edge technology, scale and global reach to support our partners. 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 mission is to champion a more sustainable sports data ecosystem and build a new era of immersive sports experiences.



Our

Services

We sit at the heart of the global sports betting ecosystem and are the trusted partner to over 400 sports organisations – including many of the world’s largest leagues and federations such as



The services we offer to our global sports league, sports team, sportsbook, broadcast and brand partners include:

Sportstech:

Automated live data and video augmentation software to help rights holders drive efficiencies, engage fans and improve performance.

Fan Engagement:

Fully immersing fans in the games they love with data-driven storytelling, gamification and personalised content.

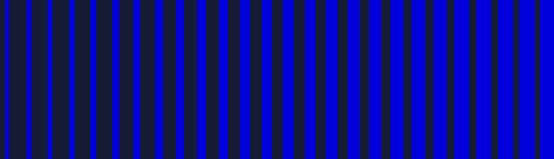
Advertising:

Driving marketing performance for advertisers with sports-based media buying and personalised ad creative via the world’s first fan-focused media activation platform.

Sportsbooks:

The fastest, most reliable live betting services including data, odds, risk management and betbuilder to drive sportsbook profits and efficiencies.





Structure of Genius Sports

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 15, 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.



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 on 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. Over the last year, we increased our volume of hardware for our Dragon in-venue system. However, the operational delivery centres (and associated supply chains) for this product largely remained the same.



Preventing Modern Slavery

This Statement sets out the actions we have taken to prevent and mitigate the risk of modern slavery within our operations and supply chain. It serves as an annual review and update upon our Modern Slavery Statement 2022-2023.

Our Policies

Code of Conduct

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

Procurement Policy

Our global Procurement Policy sets out our procurement principles, processes and ethical standards which must be followed 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 must adhere to, to ensure that sourcing is carried out in an ethically, socially 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

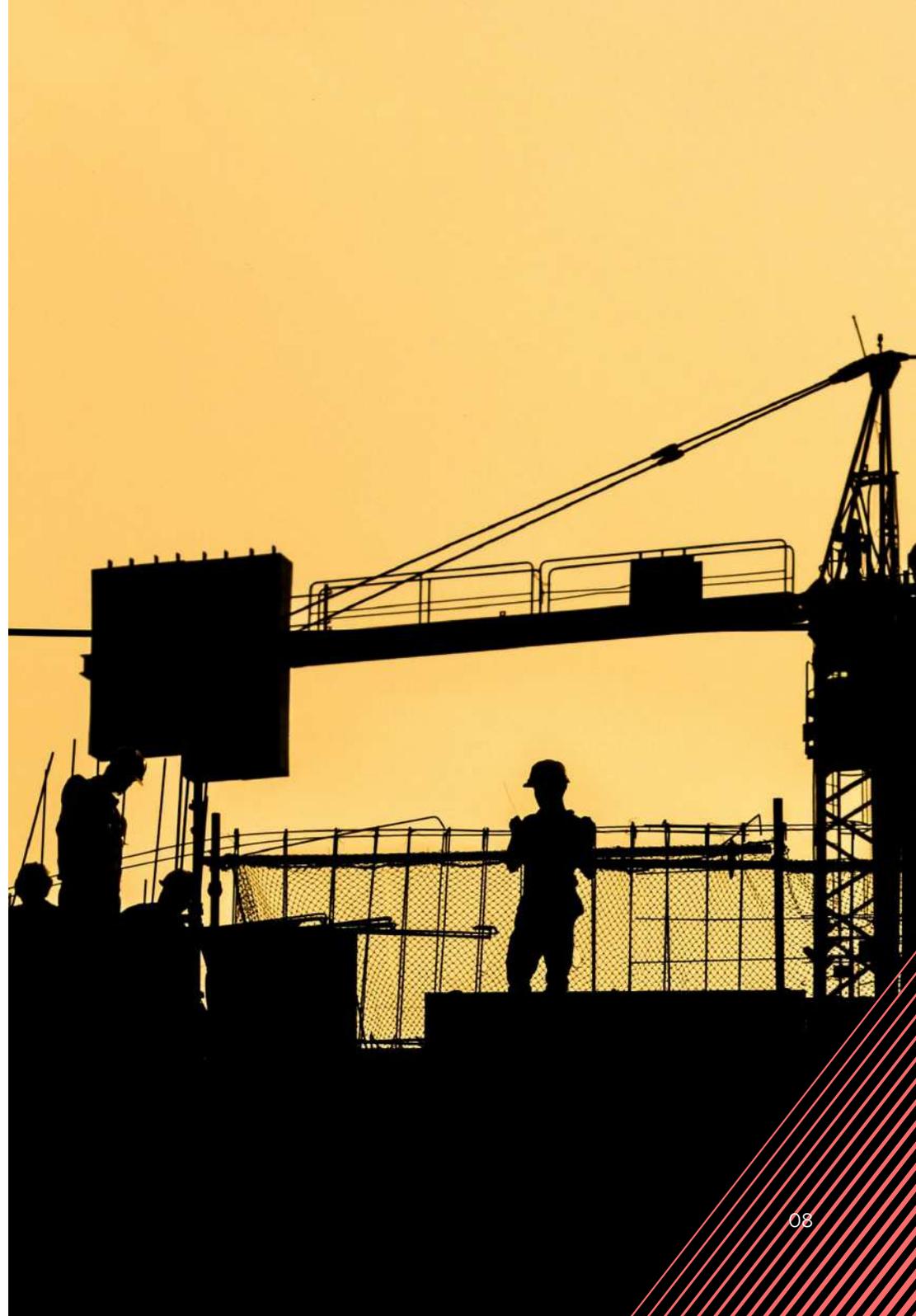
Our Sustainable Procurement Policy Statement outlines how we and our supply chain will influence the procurement choices of goods, works and services to reduce consumption of primary resources, mitigate impacts on the environment, improve resource efficiency and transparency, and improve the lives of 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.

Vendor Code of Conduct

In 2024, we launched our Vendor Code of Conduct. This sets out the minimum standards of behaviour we expect our suppliers to meet regarding labour and human rights and business integrity, among other areas. The Code is aligned with international recognised standards, including the UN Global Compact, RBA Code of Conduct and JAC Supply Chain Guidelines.

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.



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.

All new suppliers in 2023 were onboarded subject to our Procurement Policy and Sustainable Procurement Policy Statement. During the process, if suppliers were identified as having labour or ethical standards that were categorised as higher risks, we ran a further enhanced due diligence process. This deep-dive assessment was distributed to our cleaning providers, maintenance providers and non-enterprise/catalogue hardware suppliers, with an aim of identifying modern slavery risks. The checks provided satisfactory evidence that adequate measures to mitigate labour and ethical standard risks were in place.

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 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, the 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:

- Conducting an annual review of high-risk suppliers through auditing 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 our 'Workforce Incident Management Team' on how to identify and flag risks.
- Circulating our 'Worker Risk Questionnaire'.
- Maintaining our Whistleblowing procedures.
- A 'Modern Slavery Risk Assessment' was 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.
- Mapped 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

We have continued to develop our approach to identifying, assessing and mitigating supplier risk in 2023-2024. These steps included:

- Launched our 'Recruiter Compliance Principles' to ensure our Talent Team recognise early signs of concerning behaviour when interviewing and processing job applications.
- Launched similar guidelines for our in-venue Operations Team when working with contractors so they know when/where to report any suspicions of modern slavery risks.
- We continued to ensure adherence to our Procurement Policy, Vendor Code of Conduct, and our Responsible & Ethical Sourcing Policy.
- We undertook another year of deep-dive assessments on a proportion of our supplier base who were identified as posing a higher labour or ethical standards risk.
- We continued to assess all new suppliers' compliance as part of onboarding.
- We added resource to our Procurement and in-venue equipment supply chain management teams.
- 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).

In 2024, core members of our Business Operations, Risk & Procurement Teams and our Governance & Compliance Team also participated in a CPD-accredited modern slavery training course.

Our Modern Slavery

Risk Assessments 2024

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 cleaning services and some in-venue 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 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 the detection and reporting of 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.





Promoting Awareness

Genius Sports understands that policies and statements alone will not eliminate modern slavery, and greater awareness is required to help prevent human trafficking and modern slavery in the long run.

In 2024, we encouraged our employees to join TRIBE Freedom Foundation's social run clubs to help combat and raise awareness of modern slavery in the UK.

We plan to introduce a series of group-wide engagement initiatives in partnership with TRIBE, to encourage positive action from our workforce against modern slavery. We are also working with the Ethical Trading Initiative (ETI) on supply chain transparency and risk management training.

Our Team

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



Business Operations & Procurement:
Helen Taylor
Business Operations Director



Risk:
Sophie Powys
Chief Risk Officer



Legal:
Tom Russell
Chief Legal Officer



Looking to the Future

We are committed to 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 6 November 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 Asia Pte Ltd
Genius Sports Canada Corporation
Genius Sports CH SARL
Genius Sports Danmark ApS
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 Servicos Esportivos LTDA
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