



Modern Slavery

Transparency Statement

2024 - 2025

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 is dedicated to respecting and upholding the human rights and freedoms of all individuals. We have a zero-tolerance policy towards slavery, human trafficking, forced labour and similar exploitative practices.

We are committed to maintaining the highest standards of integrity in all of our business dealings and achieving our strategic and commercial goals in an ethical and responsible manner.

By fostering a culture of openness and accountability, we use 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 to identifying, preventing and addressing the risks of modern slavery within our business operations and supply chain. We are dedicated to continuously improving our policies, processes and practices to ensure that human rights are 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. We are the trusted partner to over 400 sports organizations, including many of the world's largest leagues and federations such as the NFL, EPL, FIBA, NCAA, NASCAR, AFA and Liga MX.

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.





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 12, including: Genius Sports Group Limited (a company registered in England and Wales with Company Number 09706742, with Registered Office at 27 Soho Square, London, W1D3QR, England).

Genius Offices

Genius has offices based in Australia, Bulgaria, Colombia, Estonia, Italy, Lithuania, Shanghai, Singapore, Switzerland, Ukraine, the UK and the US. We have over 2000 Geniuses and 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 GeniusIQ 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.

Our Policies

Code of Conduct

Our Code of Conduct and Ethics is a Company policy that sets out Genius' principles, morals, 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.

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 that 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. The Policy details the available reporting channels and protections afforded to whistleblowers.

The Onboarding of New Suppliers

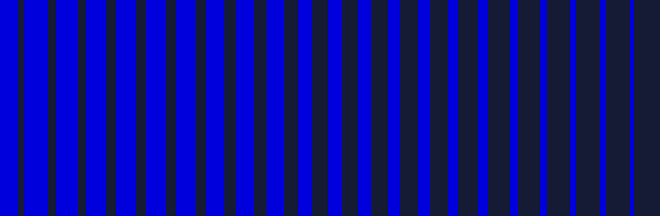
Genius requires all new suppliers to participate in a strict screening process as a mandatory part of our supplier onboarding process. This process includes disclosure of information on each suppliers' business practices and processes.

All new suppliers in 2024 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 risk, 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 the aim of identifying modern slavery risks. The checks provided satisfactory evidence that adequate measures to mitigate labour and ethical standards 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/forced labour, we undertake the following 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 at, 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 have trained key procurement-facing teams, including those involved in supplier selection and frequent purchasing 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 globally:

- Maintaining our review of high-risk suppliers by auditing those who are deemed to be at risk due to the goods or service being provided 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. These steps include:

- 'Recruiter Compliance Principles' ensuring our Talent Team recognise early signs of concerning behaviour when interviewing and processing job applications.
- Guidelines for our in-venue Operations Team when working with contractors so they know when/where to report any suspicions of modern slavery risks.
- Ensuring ongoing adherence to our Procurement Policy, Vendor Code of Conduct, and our Responsible & Ethical Sourcing Policy.
- Undertaking 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.
- Continuing to assess all new suppliers' compliance as part of onboarding.
- Maintaining our anonymous Whistleblowing Portal.
- Providing refresher training for our global Workforce Incident Management Team and onboarding all new members via the programme.

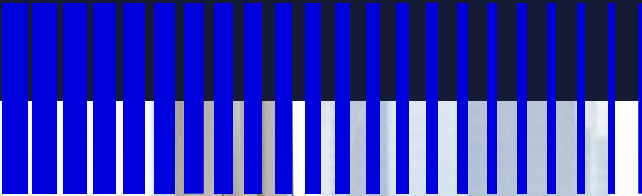
Training

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 on what remedies are available to the victim(s).

In 2024 and 2025, core members of our Business Operations, Risk, Procurement, and Governance & Compliance Teams, including senior manager engagement, participated in a CPD-accredited modern slavery training course.

Measuring and Ensuring Effectiveness

Alongside our ongoing supplier audits and due diligence updates, we have established a modern slavery working group to track our progress and ensure our actions remain effective. This working group is responsible for creating and overseeing the set programme of the work that the above-mentioned initiatives fall within. The group regularly reviews our strategies and includes representation from senior management.





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 communication and education, risk reporting and escalation response.



Communication and Education

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 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.

Risk Reporting

A Workforce Incident Report Template.

A notification process for internal and external stakeholders.

Remedy processes and post-incident review guidance.

Escalation Response

A risk escalation process from the third-party risk platform to the Risk Steering Group. This process includes the Chief Risk Officer and Chief Legal Officer.

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 or escalation steps.

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.

Collaborative

Approach

All Genius Sports' entities operate through a centralised procurement and human resources system to minimise risks of modern slavery.

We ensure staff are trained in corporate social responsibility and this training highlights the risks of slavery, forced labour and human trafficking.

We consult with clients and suppliers in relation to modern slavery and work cooperatively to achieve the collective goal of abolishing slavery, forced labour and human trafficking in any form. This collaborative approach has enabled us to develop a unified response and ensure our actions are effective across all our operations and supply chains.

Promoting

Awareness

Genius Sports understands that alongside policies and programmes, greater awareness is required to help prevent human trafficking and modern slavery in the long term.

In 2024, we formed a corporate partnership with TRIBE Freedom Foundation to help promote wider awareness of, and positive action against, modern slavery. As part of this partnership, Geniuses are encouraged to participate in the foundation's charitable initiatives and help combat modern slavery. Genius will also be hosting a Company-wide educational session in partnership with the foundation in 2025 to help teach Geniuses about their community-driven fight to end modern slavery and the role Genius Sports can play within this.



Our Team


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

- **Risk:** Sophie Powys, Chief Risk Officer
- **Legal:** Tom Russell, Chief Legal Officer
- **Procurement:** Jennifer Dixon, VP Engineering and Isaac Ade-Odunlade, Procurement and Vendor Manager

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 31 July 2025 and adopted by the relevant subsidiary entities operating in Australia and the United Kingdom.



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:

Bestbetting Ltd
Boolabus Ltd
Connextra Ltd
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
Maven Bidco Limited
Maven Debtco Limited
Maven Midco Limited
Photospire Ltd
Second Spectrum UK Ltd
Spirable Ltd
Sport Integrity Monitor

International subsidiaries:

DMY Technology Group, INC. II 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 España SL
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 Servicios Esportivos LTDA
Genius Sports SS Holdings, Inc.
Genius Sports SS, LLC
Genius Sports WE SUB LLC
Maven Topco Limited
Second Spectrum China Ltd
Second Spectrum HK Ltd
Second Spectrum SARL
Spirable Inc
Sportzcast Inc.