



MODERN SLAVERY STATEMENT 2020-2021

Purpose

Genius Sports Group is committed to improving practices to combat slavery and human trafficking.

Scope

This policy applies to all Genius Sports' business activities worldwide including all employees, contractors, consultants, temporary and other workers at Genius Sports.

Statement

Our Business and Organisation

Genius is one of the market-leading B2B providers of scalable, technology-led products and services to the sports, sports wagering and sports media industries. Genius is a fast-growing business with significant scale, distribution and an expanding addressable market.

Genius sits 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:** 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, oddsmaking, risk management and player marketing.
- **Sports Media** (brands and digital publishers): Genius engages with sports media customers both from the gaming and non-gaming sectors to provide a range of online marketing and fan engagement tools that drive customer acquisition and retention.

Our Supply Chain

Given the nature of Genius' business, we consider the risk of modern slavery being present in our supply chain to be low. Some of our services are outsourced to third party suppliers and we have reviewed and tested various outsourced supplier risk management systems to assist with our supply chain compliance programme and currently are in implementation phase. This system vets existing suppliers and assist with due diligence prior to engaging with new suppliers. High risk suppliers include light manufacturing services, landlord facility and site staff, IT services and contract cleaning services. We do not source any raw products or materials.

Our Policies

We are committed to ensuring that there is no modern slavery or human trafficking in our supply chain or in any part of our business. Our modern slavery policy reflects our commitment to acting ethically and with integrity in all our business relationships and to implementing and enforcing effective controls to ensure slavery and human trafficking is not taking place anywhere in our supply chain. In 2020 we introduced a Sustainable Procurement Statement which is in line with this statement and the United Nations Global Compact Principles. It helps to drive best practice procurement decisions and processes, e.g. ensuring respect of ethical standards.

Due Diligence Processes

As part of our initiative to identify and mitigate risk we are currently reviewing our systems and processes. We have a zero tolerance to slavery and human trafficking. To ensure all those in our supply chain and contractors comply we continue to enforce a supply chain compliance programme which aims to:

- Identify and assess potential risk areas in our supply chain
- Mitigate the risk of slavery and human trafficking occurring in our supply chain
- Monitor potential risk areas in our supply chain
- Protect whistle-blowers

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

- **Legal:** Tom Russell, General Counsel
- **Procurement:** Helen Taylor, Operations Director
- **Finance:** Iffy Obadeyi, Finance Director

In 2020, due diligence for Tier 1/direct suppliers included:

- Requesting a copy of their Modern Slavery Statement
- Confirming compliance with the annual reporting requirements per Section 54
- Conducting audits on new suppliers that fall into high-risk categories (normally by meeting at RFP stage; prior to appointment) – enquiring into their operations, how they source labour and materials, the prices they pay to suppliers beyond tier 1 further down the supply chain and their sub-contractors etc.

The final point has been particularly prudent regarding the COVID-19 pandemic in 2020 as we onboarded new temporary high-risk cleaning and disinfection services in 4-5 of our offices. We noted that some workers may be more vulnerable to modern slavery risk during the COVID-19 pandemic. Therefore, in relation to new and existing cleaning and disinfection services, we provided health & safety guidance and standards to suppliers and attempted to reduce labour risk to workers through opting for 80-100% retained or reallocated services to enable companies to put their workers on furlough (or equivalent funding schemes).

Training

To ensure an understanding of the risks of modern slavery and human trafficking in our supply chain and our business, we provide guidance for our key supplier 'touchpoint' teams to follow as appropriate. The programme resources were comprised from the Anti-Slavery Partnership Toolkit and the Home Office Modern Slavery Training Resources pages. The annual training includes; raising awareness of the signs of modern slavery, the responsibilities of supplier 'touchpoint' individuals and information on how to flag and escalate concerns.

Our Effectiveness

In 2020, we undertook a number of measures to ensure we were effectively monitoring the labour and ethical standards of our suppliers and to ensure, to the best of our knowledge, that slavery and human trafficking is not taking place within our supply chain:

- All new suppliers onboarded in 2020 had to meet labour and ethical standards criteria as part of our due diligence; including compliance with section 54 of the Modern Slavery Act.
- We have reviewed and tested various outsourced supplier risk managements systems to assist with our supply chain compliance programme. The system developed for procurement policy and supply chain verification can be tested/audited.
- We have purchased access to 70,000+ pre-stored supplier profiles which include ethical standards and reporting; allowing those in procurement roles to review potential suppliers more thoroughly.
- We have identified high risk suppliers using a triage system.
- We introduced a Sustainable Procurement Statement which is in line with this statement and the United Nations Global Compact Principles. It helps to drives best practice procurement decisions and processes, e.g. ensuring respect of ethical standards.
- Key employees in a procurement role have received training on identifying and addressing the risk of slavery and human trafficking in our business and supply chain.
- Three thorough new supplier appointment interviews were undertaken (for high-risk suppliers appointed during COVID-19) to understand labour sourcing, payment, contracting provisions etc.
- Additional reviews of existing suppliers during COVID-19 to understand the provisions for; continuation of employment, health & safety guidance, PPE and sickness management etc.

Further Steps

Following a review of the effectiveness of the steps we have taken this year; we intend to take further steps to combat slavery and human trafficking.

In 2021, we are committed to continuing to develop our approach to Modern Slavery and to ensure that we meet our sustainable procurement objectives. Key measures and objectives we have set out to achieve are:

- All third party and ethical and labour standard risks will be logged in our corporate risk register system.
- We will regularly complete risk assessments on both existing and new suppliers.
- We will map the source-to-pay process end to end including escalation pathways for concerns.
- We will introduce a new anonymous whistleblowing hotline which is aimed principally at our employees, but also available to suppliers that encourages the reporting of any wrongdoing.
- Develop an enhanced procurement learning programme with those involved in the supplier risk process.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 and constitutes Genius' slavery and human trafficking statement. It was approved by the Board on 16 December 2020.