



SUPPLIER CODE of CONDUCT

(English translation*)

In Madrid, May 2025

* This version is a translation of the internal regulation that was originally written in Spanish (check [here](#)). In the event of any discrepancy between the two versions, the Spanish version shall prevail over the English version.

* Esta versión es una traducción de la regulación interna original que se redactó en español (revisar [aquí](#)) En caso de discrepancia entre las dos versiones, la versión en español prevalecerá sobre la versión inglesa.

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I. Introduction


Sports Reinvention Entertainment Group S.L. (together with its affiliates, hereinafter referred to interchangeably as "Sportian" or "we" or "us") is committed to conducting its business ethically with honesty, integrity and in compliance with all applicable laws. The purpose of this Supplier Code of Conduct is to outline the standards and principles that any supplier, their employees, agents and subcontractors (the "Suppliers" or "you") working with Sportian are required to uphold and fully comply with. This Supplier Code of Conduct complements the Sportian Code of Ethics, and details more specific commitments our Suppliers must comply with. We expect our suppliers to adhere to this Supplier Code of Conduct, as well as to our [Code of Ethics](#), and to implement its values and principles throughout their own supply chain. This Supplier Code of Conduct (hereinafter referred to as the "Code") may be updated by Sportian's Compliance Department, and the latest version can always be accessed via [this link](#).


II. Our principles


1. Regulatory compliance

We expect our suppliers to conduct their business in full compliance with both the terms and the spirit of all applicable laws, rules and regulations. This includes compliance with regulatory requirements regarding the following matters:

 **Anti-corruption:** Suppliers have to work in full compliance with [Sportian's Anti-Bribery and Anti-Corruption Policy](#), the U.S. Foreign Corrupt Practices Act ("FCPA" for short), the UK Bribery Act ("UKBA") and any applicable anti-corruption regulations in the territories or on the matters in which Suppliers conduct business. Suppliers shall prohibit all forms of corruption, bribery and fraud, and shall never, under any circumstance, directly or indirectly, promise, authorize, offer or pay anything of value (including, but not limited to gifts, entertainment, travel, donations, contributions or employment) to any third party to improperly influence any act or decision of such third party for the purpose of promoting Sportian's business interests.


 **Anti-money laundering and counter-terrorist financing:** Suppliers must comply with all applicable anti-money laundering and counter-terrorist financing laws and must neither engage in nor assist in any way, directly or indirectly, third parties in these crimes. Suppliers shall implement appropriate due diligence processes to ensure any subcontractor working in the provision of services for Sportian has not been involved in these crimes. Suppliers shall report as soon as possible to Sportian any irregular payments, suspicious transactions or suspected money laundering involving Sportian.


 **Antitrust:** Free competition is one of the basic pillars of the market economy and its proper functioning, so we are committed to respecting antitrust and fair competition laws. All Sportian Suppliers shall conduct business in full compliance with the antitrust, free and fair competition laws governing the jurisdictions and territories in which they conduct business. This includes laws and regulations related to illegal cartelization and the information sharing with competitors.


 **Trade:** Suppliers shall comply with all applicable international trade controls and local rules, regulations and controls on any transfer of technology (physical and/or electronic), exports, re-exports and imports.


2. Human Rights and Fair Labor Practices


All Suppliers must fully comply with employment laws, uphold human rights and promote an inclusive work environment. Furthermore, Suppliers shall obtain similar commitments from their own suppliers, subcontractors and distributors. This commitment includes:


 **Labor and Human Rights:** Suppliers shall promote and uphold the fundamental human rights as set out in the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights and the UN Global Compact Principles. All Suppliers shall comply with applicable labor regulations, including standards set out by the International Labor Organization, regarding all labor aspects and, specifically what pertains to minimum age and child labor, freedom of association, the right to organize and to collective bargaining, abolition of forced and compulsory labor, the promotion of equal remuneration and the prohibition of discrimination at work.

 **Diversity and Inclusion:** We expect our Suppliers to value diversity, create an inclusive work environment and comply with all applicable accessibility standards. Suppliers must be committed to ensuring gender equality in their workplace.

 **Anti-Discrimination:** Suppliers must not engage in any form of discrimination against workers based on age, disability, ethnicity, gender, marital status, nationality, political affiliation, race, religion, sexual orientation, gender identity, pregnancy, ideology or public opinion, union membership or any other protected physical or social condition of its employees as defined by the best values and principles embodied in applicable supranational, national or internal Sportian regulations. This applies to all aspects of employment, including hiring and other day-to-day practices.


 **Anti-Harassment and Abuse:** Suppliers are required to maintain a workplace free of harassment and abuse. This includes prohibiting any form of harsh and inhumane treatment towards workers, such as verbal abuse, psychological harassment, physical aggression and sexual harassment. Suppliers must ensure a safe and respectful environment for all employees, fostering a culture that rejects any form of mistreatment or misconduct.


 **Health and Safety:** Suppliers shall implement appropriate measures to ensure compliance with all applicable health and safety regulations to prevent accidents and injuries to health arising out of, linked with, or occurring in, the course of work.


 **Prohibition of Forced Labor, Child Labor and Human Trafficking:** All forms of forced labor, including indentured, bonded or any other form of forced labor, are prohibited. Suppliers must not use, encourage or engage in child labor. Child labor means labor that deprives children of their childhood, their potential and their dignity, and that is harmful to their physical or mental development. Suppliers also must neither use, encourage nor engage in human trafficking. Our suppliers shall contribute to the eradication of child labor and shall prevent any minor from performing work that is hazardous or interferes with his or her education or physical, mental, moral and social development.


3. Ethical Business Practices

Suppliers must always act in an honest and transparent manner while doing business with Sportian or on behalf of Sportian. This includes complying with the following principles:


 **Business Records:** Suppliers are expected to keep accurate books and records in compliance with standard accounting practices. Suppliers must ensure that all statements and representations are truthful and shall submit true and accurate invoices to Sportian.


 **Conflicts of Interest:** Suppliers must avoid conflicts of interest and are required to disclose any potential conflict of interest situations to Sportian. Suppliers must refrain from engaging in any transactions or interactions with any Sportian employee whose spouse, domestic partner, other family member or relative holds a financial interest in the Supplier, unless such transactions or interactions, as applicable, have been granted prior approval by Sportian's Compliance and/or Legal Department.


 **Contracts:** Suppliers must meet and comply with all terms and conditions outlined in services proposals accepted by and/or contracts signed with Sportian.

 **Gifts and Entertainment:** Suppliers must refrain from offering any gifts or entertainment to gain an improper business advantage and shall not accept any kind of gift that could potentially create the appearance of impropriety. Gifts, meals, entertainment and trips must always be appropriate, of moderate value and for a bonafide business purpose. In any case the limits set by Sportian are:

- Regarding Entertainment and Hospitality: Not to exceed 75 Euros/person.
- Regarding Gifts: Not to exceed 300 Euros/Gift/year.
- Gifts and entertainment received or given to public officials or entities are strictly prohibited.


 **Government Interactions:** Suppliers may only interact with government officials (including employees of government agencies or government instrumentalities) on behalf of Sportian after obtaining prior written approval from Sportian. In the event such interactions become necessary, Sportian will provide comprehensive instructions that the Supplier must strictly adhere to. Additionally, it is responsibility of the Supplier to ensure that employees involved in these interactions have received appropriate training.


 **Public Statements:** Suppliers must not speak on behalf of Sportian in any public capacity, including interactions with the press, on social media platforms, among others, except with Sportian's prior written consent.


 **Responsible use of Artificial Intelligence (AI):** Suppliers who provide services using AI are responsible for the governance, design, development, monitoring, and performance of their AI systems. AI systems should compliance with applicable regulations.


4. Protection of information and intellectual property

As part of our business relationship, Suppliers may have access to proprietary and/or confidential information that should be safeguarded according to the following standards at minimum:

 **Confidential Information:** Suppliers must maintain strict confidentiality regarding all information they have access to during the course of their work, business and/or personal activities with Sportian and/or its Personnel. Suppliers must take all necessary measures to prevent misuse, theft, fraud, unauthorized access or disclosure of our information. Suppliers bear direct responsibility for safeguarding Sportian's information from any possible damage, loss or unauthorized access, and for ensuring its secure custody.

 **Personal Information:** Suppliers must comply with all applicable privacy and data protection laws. Furthermore, Suppliers are required to follow Sportian's guidelines (whether set forth in contractual documentation or in additional written instructions) whenever they access data or personal information as part of their business and marketing relationship with Sportian.

 **Intellectual Property:** Suppliers are expected to respect and protect Sportian's intellectual property rights, industrial and commercial information, and shall only use programs and software that have been legitimately acquired and licensed in accordance with their associated licenses or terms of use. Suppliers shall not use Sportian's name, logo or other trademarks without prior written authorization from a legal representative of Sportian.

 **Insider Trading:** Suppliers must comply with applicable insider trading laws, regulations, supranational, local and/or internal regulations. If Suppliers become aware of material non-public information relating to Sportian, and/or any of its affiliates or their business, they are strictly prohibited from engaging in any trading activities involving securities of Sportian, and/or its affiliates. This includes refraining from purchasing, selling or trading such securities.

5. Corporate Social Responsibility

Suppliers are required to implement or have a clearly defined action plan to implement within a reasonable timeframe agreed with Sportian:

- A comprehensive Corporate Social Responsibility (CSR) policy that encompasses social, environmental and economic aspects tailored to the size and nature of the Supplier's business.
- Clear CSR commitments aligned with the principles of the UN Global Compact. These commitments should refer to their own initiatives or be part of initiatives launched by their respective sector or industry.
- Integration of standards and guidelines that guide CSR policies, such as ISO 26000, or relevant reports, such as the Global Reporting Initiative (GRI).

 **Environmental Responsibility:** Our Suppliers must develop, implement and maintain environmentally responsible business practices, complying with all environmental regulations, as well as and applicable industry standards, aligned with our [Be Kind to the Planet Policy](#). Suppliers shall obtain, keep current and comply with all required environmental permits and reporting requirements of applicable permits and regulations regarding hazardous materials, greenhouse gas (GHG) emissions, waste management (Reduce, Reuse, Recycle; and correct Disposal) and water management. Suppliers should also make practical efforts to minimize the use of natural resources and, where possible, be renewable or sustainably sourced.

We expect our Suppliers to have an understanding of the environmental risks, impacts and responsibilities associated with the products and services they provide, and to work towards implementing an effective environmental policy, statement or program to mitigate environmental risks, monitoring their environmental performance and making continuous improvements through practical measures employing leading practices where possible.

III. Training and Communication

Suppliers are responsible for creating and upholding appropriate policies, procedures, training and awareness programs to ensure compliance with the principles outlined in this Code, as well as with all applicable laws, rules, national, local and Sportian internal rules and regulations. Suppliers must effectively communicate these principles to their employees and manage compliance with this Code. Sportian reserves the right to request and assign specific compliance training for relevant personnel of the Supplier, if deemed appropriate.

IV. Audits

Sportian may request information and documentation from Suppliers to verify their compliance with this Code. Suppliers must respond to such requests in a timely manner and within 10 business days from the date of receipt of the request.

Sportian may conduct audits, at its own expense, to assess Suppliers' compliance with this Code. Such audits may take place once a year during regular business hours, and Sportian will provide reasonable prior written notice. During the audit process, Sportian will make reasonable efforts to prevent or minimize possible damage, injury or disruption to Supplier's facilities, equipment, personnel and business.

V. Reporting concerns

We encourage all of our Suppliers to act proactively by reporting suspected violations of this Code.

Suppliers who suspect that any employee, representative or their own employees or subcontractors providing services to Sportian have engaged in illegal or improper behavior or potential violations of the principles outlined in this Code and/or those expressly referenced in applicable regulations, including Sportian's internal regulations, are required to report such incidents to Sportian promptly. Reports can be submitted through our Information Management System [Ethics Line](#), which allows the option of anonymous reports.

Sportian expressly forbids any retaliation or discrimination against individuals who, acting in good faith, report suspected misconduct or violation of any law, rule, regulation or principle outlined in this Code. The Suppliers' relationship with Sportian will not be affected by an honest report related to misconduct, and Suppliers must refrain from retaliating in any manner against individuals who make such reports in good faith.

If you have questions about our Supplier Code of Conduct, please contact compliance@sportian.com.

VI. Violation of the Code

Sportian may immediately terminate the engagement with the Supplier in the event of non-compliance with this Code or applicable laws.