



# Statement on Human Rights

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# Human Rights Statement

## OUR APPROACH

Comcast Corporation (“Comcast,” “we,” or “our”) is committed to promoting values that foster human rights, acting with integrity, and doing the right thing. Our approach to human rights is informed by international standards including the United Nations’ Guiding Principles on Business and Human Rights, the United Nations’ Universal Declaration of Human Rights, and the ILO Declaration on Fundamental Principles and Rights at Work.

## POLICIES

Our policies set forth our guiding principles and communicate our values both internally to employees and externally to our business partners and other stakeholders. These policies, and the trainings that reinforce them, establish that Comcast employees and our business partners strive to operate with integrity, including keeping human rights at the forefront, wherever we do business.

Our core values and principles of business conduct are reflected in our [Code of Conduct](#) which highlights, among other things, our commitment to fostering a culture of fairness, respect, and inclusion; maintaining a work environment free from discrimination and harassment; protecting the environment and encouraging sustainable innovation and environmentally responsible business decisions; respecting privacy and protecting the personal information we collect; obeying the law everywhere we operate; and nurturing ethical relationships with suppliers and other business partners. The Code of Conduct is published in 15 languages and dialects

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and is publicly available on our corporate website. We review our Code annually to ensure that it continues to reflect the high standards of integrity we expect in our business practices.

Comcast also maintains a [Code of Conduct for Suppliers and Business Partners](#), which sets forth the standards expected of any supplier or business partner doing business with us. The Supplier Code is published in 18 languages and dialects and is also publicly available.

Our efforts to help prevent human rights violations are further detailed in our [Statement on Modern Slavery and Supply Chain Values](#), which provides our third-party risk management framework for human rights, including, as appropriate, due diligence, training and auditing activities.

Comcast maintains a deep-rooted responsibility to conduct our business in a manner that respects human rights and enhances the overall quality of life of our employees and others who work with us. Our business units

acquire resources from around the world, and we partner with suppliers and manufacturers spanning the Americas, Asia, Africa, Europe, and Australasia. As such, our responsibilities extend to our supply chain, the communities we serve and the planet we all share. The Supplier Code incorporates several International Labour Organization (ILO) Conventions including prohibitions on discrimination and harassment and other human rights violations.

The [Comcast Statement on Harassment and Discrimination](#) highlights our strong policies against harassment and discrimination in any form and our commitment to creating a work environment where employees feel comfortable raising concerns without fear of retaliation.

In addition to these enterprise policies, we have business unit policies relevant to human rights and labor exploitation.

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## COMCAST NBCUNIVERSAL LISTENS AND SKY LISTENS

Our employees, suppliers, and business partners around the world are encouraged to report suspected illegal or unethical conduct, including suspected human rights issues in our businesses or in our supply chains, through our [Comcast NBCUniversal Listens and Sky Listens](#) programs. Our programs provide several channels for speaking up, including a 24-hour helpline and web portal that are administered by an independent third-party company. Once reported, concerns are promptly routed to the appropriate personnel and investigated.

Violations of our Code of Conduct or Company policy may result in disciplinary action for our employees, up to and including termination of employment, regardless of an employee's title or tenure. Our Code of Conduct prohibits retaliation against those who raise concerns in good faith.

Our Comcast NBCUniversal Listens and Sky Listens web portal is available in 15 languages and dialects and is publicized in our Code of Conduct and Supplier Code, both of which are available on our corporate website. As shown in our employee engagement surveys, our employees are aware of how to report ethical concerns or observed misconduct and believe they can report such matters without fear of retaliation.

## EMPLOYEE TRAINING PROGRAMS AND COMMUNICATIONS

Central to our enterprise training program is our Code of Conduct, which includes fostering ethical relationships with suppliers and other business partners as one of our core principles. Our employees are required to acknowledge the Code of Conduct annually and receive training on our Code of Conduct on a biennial basis.

Employee communications and intranet content across our business units establish “tone from the top” on Company culture and regularly raise awareness about how to speak up.

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## OVERSIGHT

We rely on our cross-functional teams comprised of compliance specialists for management of potential issues that impact our commitment to upholding human rights across the Company. Senior management is responsible for overseeing our global and domestic efforts to combat human rights violations. To support that oversight, Company executives, as well as our Board or its Committees, receive periodic reports regarding human rights-related issues; risk assessments highlighting areas of potential concern or improvement; and enhancements to the Company's human rights program, policies and procedures.

## INDUSTRY ENGAGEMENT

We seek to collaborate with external stakeholders, including industry peers and other organizations such as NGOs, to improve and enhance our own processes and promote industry-wide improvements with respect to human rights. To further support our efforts we are members of the

Responsible Business Alliance (RBA) and believe this collaboration helps achieve long-term positive change in the advancement of social, ethical, and environmental responsibility in the global supply chain.

## GIVING BACK

We are also committed to giving back to the communities we serve. Our current priorities include those relating to Digital Equity through our [Project Up](#) initiative, [Diversity, Equity & Inclusion](#), [Environment](#), [Values & Integrity](#), [Accessibility](#) and [Supporting our Military](#).