



Statement on Modern Slavery and Supply Chain Values 2020

Comcast is committed to human rights and to acting honestly and with integrity in everything we do. As set forth in our [Human Rights Statement](#), we respect and support the principles of the United Nations' Universal Declaration on Human Rights. We commit to addressing the risks of modern slavery and human trafficking in our own business and our supply chains. This is consistent with our core business philosophy and values, which are outlined in our [Code of Conduct](#) and our [Code of Conduct for Suppliers and Business Partners](#).

Our approach to preventing modern slavery, including human trafficking and labor exploitation, reflects the diversity of our business. Comcast business units employ varying controls and due diligence efforts to understand and mitigate the risks of modern slavery. As our understanding of the risk evolves, so does our approach.

In this Statement, we explain the steps taken within Comcast to identify and address modern slavery and human trafficking in our businesses and supply chains in our last financial year, 1 January – 31 December 2019.

The term “Comcast” as used in this Statement refers collectively to Comcast Corporation and its subsidiaries, including Comcast Cable, NBCUniversal, and Sky.

Who We Are

Comcast is a global media and technology company with more than 190,000 employees worldwide, and three primary businesses: Comcast Cable, NBCUniversal, and Sky.

Through the Xfinity brand, Comcast Cable delivers best-in-class internet, television, voice, mobile, and home management services with more than 30,000,000 customer relationships across the United States. Comcast Business offers Ethernet, Internet, WiFi, Voice, TV, and Managed Enterprise Solutions to help organizations of all sizes transform their business.

NBCUniversal is one of the world's leading media and entertainment companies in the development, production, and marketing of entertainment, news and information to a global audience.

NBCUniversal owns and operates a valuable portfolio of news and entertainment television networks, a premier motion picture company, significant television production operations, a leading television stations group, world-renowned theme parks, and a suite of leading Internet-based businesses.

Sky is one of Europe's leading media and entertainment companies, connecting customers to a broad range of video content through its pay television services. It also provides communications services, including residential high-speed internet, phone, and wireless services. Sky operates the Sky News broadcast network and sports and entertainment networks, produces original content, and has exclusive content rights.

Our business units require resources from around the world, and as such, we partner with manufacturers spanning the Americas, Asia, Australasia, Europe and Africa.

OUR POLICIES AND CONTROLS

Comcast’s policies set forth our guiding principles and communicate our values both internally to employees and externally to our business partners and stakeholders. These policies, and the trainings that reinforce them, establish that Comcast employees and our business partners must operate with integrity wherever we do business.

[Comcast Code of Conduct](#)

Our Code of Conduct provides the framework for what we stand for and how we operate with integrity. In 2019, Comcast streamlined its Code of Conduct to make it even easier for our employees across all business units to understand our expectations of them and commitments as a company. We launched this updated Code of Conduct in March 2020. The enterprise Code of Conduct unites Comcast, NBCUniversal, and Sky behind a shared commitment to what has long been a core value – “Doing the right thing and acting with integrity.” We live this core value by conducting ourselves in a way that maintains trust and respect around the globe.

The new Code of Conduct reaffirms our commitment to fair employment practices and promoting respect for human rights within our supply chain. Our Code of Conduct requires all employees to strive to do business only with suppliers who will uphold the commitments of our Code of Conduct and comply with all applicable laws and standards relating to human rights.

Our Code of Conduct is published in 13 languages and is publicly available on our corporate website. We review our Code annually to ensure that we continuously strive for the highest standards of integrity in our business practices.

[Comcast Code of Conduct for Suppliers and Business Partners](#)

Over the past year, we published guidance and standards applicable to our suppliers and business partners across our business units under a single enterprise Code of Conduct for Suppliers and Business Partners (“Supplier Code”). This allowed us to unify in one place the already existing expectations and standards in our business units that suppliers and business partners act ethically and comply with applicable laws and regulations in connection with their provision of products, services, or staffing to or for our Company. Specifically, the Supplier Code requires our suppliers and business partners to prevent and not support or engage in forced labor or human trafficking and to hold their agents and recruiters to the same standards. It also sets additional expectations about treating people fairly and with respect, including ensuring that all workers meet applicable legal minimum age requirements, are provided compensation required by law and/or contract, and have a safe, secure, and healthy working environment.

Business Unit Policies

In addition to our Company’s enterprise Code of Conduct and Supplier Code, we have business unit policies relating to modern slavery and supply chain values. For example, Sky maintains a [Human Rights Policy Statement](#) that outlines in more detail Sky’s specific approach to human rights issues. The Human Rights policy is reviewed and updated periodically by Sky’s Human Rights Leadership Group.

Training

Comcast is redesigning its enterprise training program to remain in step with the newly updated Code of Conduct, which includes fostering ethical relationships with Suppliers and other Business Partners as one of its core principles. Individual businesses also continue to develop guidance on ethical relationships with suppliers and modern slavery tailored to their business needs. For example, in 2019 Sky trained targeted employee audiences on human rights and modern slavery awareness and provided training developed by third-party industry

organizations such as the Responsible Business Alliance and the Ethical Trade Initiative.

Raising Concerns

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. Comcast NBCUniversal Listens and Sky Listens provide several channels for speaking up without fear of retaliation, including a 24-hour helpline and web portal that are administered by an independent third-party company. 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 ACTIONS

Comcast has adopted various approaches to protect workers from modern slavery, human trafficking, and labor exploitation in our business and in our supply chains. When dealing with third parties, Comcast and its business units seek to work with third parties who are legitimate and reputable, qualified to perform the services for which they are engaged, and similarly committed to complying with the law and adhering to the standards of business conduct set forth in our Supplier Code. Comcast maintains risk-based due diligence procedures designed to achieve this objective. In addition to our routine third-party diligence processes, our businesses conduct due diligence specifically tailored to modern slavery. At Comcast Cable, for instance, our program leverages third party self-assessments to ensure that suppliers are abiding by social responsibility standards, including in the areas of human rights and modern slavery.

Sky annually conducts a Modern Slavery Risk Assessment process as part of its broader human rights risk assessment. The risk assessment is reviewed by Sky's Human Rights Leadership Group. This senior leadership group includes representatives responsible for embedding human rights in their area of the business and draws on input from various human rights organizations and rightsholders.

In 2019, Sky also mapped the sourcing of high-risk minerals that are used to manufacture its technology products. Through this mapping process, Sky identified suppliers with varied levels of controls, policies, and due diligence approaches. Sky also identified the smelters, refiners and downstream companies that are part of the Responsible Minerals Assessment Program.

In 2019, Sky conducted 60+ accredited third-party audits across its electronic product supply chain. Sky also reviewed its approach to sourcing branded merchandise with input from third-party Sedex Members Ethical Trade Audits (SMETA), a widely used ethical audit format. The audit involved significant supplier engagement, training with the Ethical Trading Initiative and mapping the supply chains, reviewing the practices of hundreds of manufacturers, including through in-person and telephone interviews, and reviewing audit reports. Through this extensive effort, Sky developed a merchandise approval process that includes, among other things, pre-assessment of materials, audit reports, and corrective actions ahead of purchase approval.

In 2019, NBCUniversal similarly conducted a risk assessment of its global businesses in order to identify those activities most at risk for modern slavery and labor exploitation. Among the higher-risk areas of NBCUniversal's business are consumer products licensing which involves third party factory production, the operations of Universal Parks & Resorts, and the use of outsourced labor to support various aspects of NBCUniversal's business, such as facilities management and content production. The risks in these areas are managed through a combination of controls, including periodic auditing. For example, in 2019 the Universal Brand Development division, which licenses NBCUniversal Intellectual Property to create, sell and distribute themed merchandise via a network of factories, conducted over 1,300 factory audits prior to approving them for use.

The Universal Parks & Resorts division owns and operates theme parks and resorts in the United States and Japan. Universal Studios Singapore is owned and operated by a third-party company which licenses Universal intellectual property. Each park is located in a geographic region with a high level of government enforcement for labor laws and regulations. Each park has its own Human Resources department and tracks team member working hours to ensure overtime is accurately paid. Further, each park has an Environmental, Health and Safety department that is dedicated to maintaining a safe working environment, and a Health Services department on-site. Where third-party restaurants and retail stores are permitted to operate within the parks, they are required to adhere to all local labor laws, including standards prohibiting modern slavery, as a condition of the contract. A new park is currently under construction in Beijing, China and a new park is planned in Orlando, Florida. Once constructed, Universal Beijing Resort will be operated to the same standards as our other Universal resorts, and the new park in Orlando will fall under the same management and controls as our current Orlando parks.

OUR INDUSTRY EFFORTS

Comcast seeks to collaborate with industry peers and NGOs in order to improve and enhance our own processes and promote industry-wide improvements. NBCUniversal and Sky are both founding members of the UK TV Industry Human Rights Forum (TVIHRF). NBCUniversal and Sky are also members of the [Responsible Media Forum](#), a group convened to discuss and agree on responsible business practices in the media industry, including those which relate to human rights and modern slavery. Both businesses also participated in the UK Home Office's industry consultation to evaluate potential changes to the requirements of the UK Modern Slavery Act.

As a member of the Business Against Slavery Forum, a partnership between business' leading in tackling modern slavery and the Home Office, Sky is committed to working with other businesses to share learning on tackling modern slavery in supply chains. In 2019, Sky helped develop the ambitions and program for the Forum, identifying focus areas for collaboration.

Recognizing that international sporting events may take place in countries that are high risk for human rights abuses, Sky is a founding Advisory Council Member of the Center for Sports and Human Rights established by the [Institute of Human Rights and Business](#). In 2019, Sky used the Broadcaster Due Diligence tool and input from members of the Center to assess human rights risks associated with broadcasting Sky events.

We also recognize that NGOs and charitable organizations have a key role to play in raising the profile of modern slavery risks and helping to support victims. NBCUniversal worked with [Unseen UK](#), a charitable organization focused on identifying and supporting victims of modern slavery, on a number of awareness-raising initiatives during 2019. Sky and NBCUniversal also supported the UK Modern Slavery Helpline, which is run by Unseen.

This Statement on Supply Chain Values has been signed by the undersigned director for and on behalf of each of Comcast Cable Communications, LLC, NBCUniversal LLC, FreeWheel Media, Inc., and Sky Limited insofar as this Statement relates to the activities of those respective entities or their subsidiaries.



Thomas J. Reid
Director

Date: June 16, 2020