

# Statement on Sexual Harassment and Discrimination

Our company has been built on a foundation of respect, integrity, and trust, and we are committed to creating and fostering a work environment that promotes integrity. In furtherance of the foregoing, sexual harassment and harassment or discrimination of any kind are not tolerated.

As described in more detail below:

- We have strong policies against sexual, racial, and other forms of harassment and discrimination.
- We strongly encourage employees to report concerns about any such behavior.
- We seek to create a workplace culture where employees feel safe and valued and can be who they are.
- We have substantial training programs to educate our employees about our policies and procedures, including training on how to report concerns and our anti-retaliation policy.
- We have appropriate Board oversight of significant sexual harassment and discrimination matters.

Any allegation of harassment or discrimination is taken very seriously, and we take appropriate action in response to founded allegations.

## Policies

We have clearly defined and well-communicated policies that prohibit all forms of harassment and discrimination, sexual or otherwise, as well as other inappropriate conduct that does not rise to the level of harassment or discrimination under the law. As set forth in our [Code of Conduct](#):

- We are committed to treating people fairly and with respect and believe that we have a collective responsibility to foster a culture of fairness, respect, and inclusion that drives us to value and embrace differences.
- Harassment and discrimination are not tolerated in any form. We prohibit any form of harassment or discrimination based on an individual's race, ethnicity, sex, sexual orientation, gender identity or expression, religion, age, marital status, national origin, ancestry, pregnancy or maternity, medical condition, physical or mental disability, or any trait or status protected by law.
- We prohibit retaliation against any employee, officer, or director who in good faith raises a concern or assists in the investigation of suspected illegal or unethical conduct, even if a reported concern is ultimately unsubstantiated.

## Comcast NBCUniversal Listens and Sky Listens and Employee Training Programs

We are committed to creating an environment where employees feel comfortable speaking up without fear of retaliation. We have an open door policy and culture of open communication so employees can report any questions or concerns—whether involving a workplace issue, a concern about suspected illegal or unethical conduct, or any other matter—without fear of retaliation. [Comcast NBCUniversal](#)

[Listens](#) and [Sky Listens](#), which provide a helpline and web portal, are managed by an independent third-party company and are available 24/7 for employees to report a concern. We encourage employees to speak up if they see or suspect violations of law or our Code of Conduct. As shown in various employee engagement surveys, a significant majority of our Comcast NBCUniversal employees are aware of how to report ethical concerns or observed misconduct and believe they may report such matters without fear of retaliation.

Employee communications are frequently done to raise awareness about how to seek guidance or raise a concern. We also have comprehensive and mandatory anti-harassment training programs for employees.

Despite already having had long-standing robust policies, procedures, and trainings, Comcast and NBCUniversal in 2017 and 2018 reviewed, further strengthened, and harmonized in certain respects our policies, procedures, and trainings as they relate to allegations of sexual harassment and similar misconduct, including by:

- Issuing a revised NBCUniversal companywide policy, “Providing a Respectful Working Environment,” that combined, enhanced, and expanded existing anti-discrimination, anti-harassment, and anti-retaliation policies.
- Increasing the availability and visibility of NBCUniversal’s reporting mechanisms, including by creating a button to “Raise a Concern” on the landing page of its intranet site and increasing the frequency of its “Speak Up” campaign communications.
- Providing enhanced respectful workplace trainings, including expanding in-person trainings for employees in various divisions, enhancing online trainings, requiring a respectful workplace training, even for employees who had recently completed their required training on this subject, and increasing the frequency of required trainings for employees.
- Revising procedures for the handling of sexual harassment complaints at Comcast and NBCUniversal, including by creating a new Fair Employment Practices Group at NBCUniversal, and centralizing oversight of all sexual harassment investigations at Comcast Cable by the Labor & Employee relations team.

## Oversight

Senior management and our Board of Directors oversee our efforts to combat harassment and discrimination of all forms. Our Board reviews and approves our Code of Conduct, which includes our fair employment practices principles as summarized above. Our Board or one of its committees also receives regular updates from management about significant matters involving our company in the normal course, including those relating to workplace issues. For example, our Board or one of its committees receive periodic reports on our Comcast NBCUniversal Listens program and employee engagement surveys. They also received updates regarding the reviews and revisions to our various policies, procedures, and trainings for sexual harassment and similar misconduct that were performed in 2017 and 2018. In addition, our Board would be informed if there were ever any allegation or investigation into a serious claim of discrimination or harassment involving one of our executive officers under SEC rules.

Management and our Board also have a robust process to identify, manage, and mitigate key risks confronting our company. Our Board specifically oversees a set of key risks facing our company that are identified through an enterprise risk management process. Among these Board-level risks are risks relating to our reputation, which include sexual harassment claims involving our talent or management. In addition, our Board reviews other significant risks overseen by our management. Among these are human capital risks relating to sexual and other harassment and overall workplace employee culture.

Our Board and senior management team are committed to, and management is incentivized through our executive compensation program to create, a culture of integrity and foster diversity and inclusion efforts at our company.

### Third-Party Recognitions

We are committed to creating an engaged workforce through proactive listening and constructive dialogue, and believe, based on the results of our annual employee engagement surveys, that our employees value our workplace culture and recognize us as an employer of choice.

- Most recently, Comcast (i) was named to Fortune magazine's "Best Big Companies to Work For", "100 Best Places to Work For 2019", "75 Best Large Workplaces for Women", and "Best Workplaces for Diversity"; (ii) ranked #15 on LinkedIn's "Top Companies" list for 2019; and (iii) earned a score of 100 on HRC's 2020 Corporate Equality Index.