



SKY PLC

**Group Whistleblowing Policy and
Guidance**

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[Whistleblowing Policy statement](#)

At Sky plc (“Sky”) we are committed to conducting our business fairly, with respect, honesty and integrity and we expect all Sky people to maintain high standards of ethical behaviour and transparency and raise any concerns as early as possible. This Whistleblowing Policy explains how you can do so responsibly if you have reasonable grounds for believing there is serious malpractice or business misconduct.

Sky will do what is reasonably possible to protect you from harassment or victimisation for raising issues in good faith, even if you turn out to be mistaken. Eventual protective measures will be agreed with you in advance. This policy also explains how to take the matter further if you are dissatisfied with Sky’s response.

[About this Whistleblowing Policy](#)

The purpose of this Whistleblowing Policy is to:

- encourage Sky people to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
- provide Sky people with guidance as to how to raise any concerns;
- reassure staff that they should be able to raise concerns without fear of reprisals, even if they turn out to be mistaken.

[Scope](#)

This Whistleblowing Policy applies globally to all Sky people in all territories working at all levels of the organisation, including senior managers, officers, directors, employees (whether permanent, fixed-term or temporary), consultants, contractors, trainees, seconded staff, home workers, casual workers and agency staff, volunteers, interns, agents, intermediaries, , sponsors, or any other person associated with Sky, or any of Sky’s subsidiaries or majority owner businesses and their employees, wherever located (collectively referred to as ‘Sky people’ in this policy).

This Whistleblowing Policy does not apply to personal grievances concerning the terms and conditions of your employment contract. For details on how these would be dealt with please contact your local HR department.

[Who to contact about this policy](#)

Any questions regarding this Policy should be directed to the Whistleblowers’ Champion¹, your HR Department, Compliance Department and/or compliance contact according to your local laws and policies.

¹ Only for UK and Republic of Ireland (ROI) according with the requirements of Financial Conduct Authority rules.

[What is a concern?](#)

A concern is a worry, suspicion or knowledge about a wrongdoing that has taken place, is taking place or is likely to take place within Sky, or happening outside Sky but having an impact on it.

Wrongdoing means going against any Sky policies or breaking the law and can include:

- a criminal offence has been committed, is being committed or is likely to be committed;
- a breach in competition law, e.g. price fixing with competitors;
- a financial or non-financial misadministration, malpractice, impropriety or fraud;
- a conflict of interest (including but not limited to insider dealing or inappropriate supplier appointments);
- any questionable accounting or auditing matters;
- an employee, client, customer or supplier, has been ill-treated repeatedly despite a complaint being made;
- a miscarriage of justice has taken place;
- a damage to the environment is being committed or is likely to be committed;
- someone has failed to comply with professional and/or legal obligations including breach of confidentiality;
- any health and safety risk at work;
- a job applicant has been shown undue favour over a contractual matter;
- any conduct likely to damage Sky's reputation;
- a breach of our internal policies and procedures;
- a deliberate concealment of any of the above matters.

This list is not exhaustive.

[How do you comply?](#)

You must ensure that you read, understand and comply with this Whistleblowing Policy.

If you have any concerns related to suspected wrongdoing, business misconduct or danger affecting any Sky activities, you should report it under this Whistleblowing Policy.

[Why should you comply?](#)

For Sky people:

Certain jurisdictions may impose specific obligations on individuals to report to the police any information which they know or believe might be of material assistance in (a) preventing the commission by any other person of a relevant offence, or (b) securing the apprehension, prosecution or conviction of any other person for a relevant offence, to disclose that information as soon as is practicable to do so to the local police force. It may be your responsibility to comply with the laws of the country you work in. Please speak to your HR or Security department for further information in relation to your local jurisdiction.

Sky encourage all Sky People to report the wrongdoing of others.

For Sky - A breach of this Whistleblowing Policy by a Sky person may result in Sky breaching any applicable laws in one or more jurisdictions. An offence under applicable law could result in Sky facing unlimited fine, negative publicity and serious damage to the reputation of the Sky brand.

How to raise a concern

If you have any concerns or questions about issues that fall under this Whistleblowing Policy, you may contact your manager (if appropriate), HR department, Compliance Department or compliance contact according to your local laws and policies or raise the issue via the confidential helpline below. Sky would prefer that you raise such an issue at the earliest possible stage.

Sky does not require you to reveal your identity when using the confidential helpline. However, you should be aware that anonymity can make it more difficult or impossible to investigate any concern raised as we will be unable to obtain further information from you.

If you choose to provide contact information, your identity will be kept confidential, if you request this, so far as is reasonably possible. Sometimes Sky may be required by law to reveal your identity. In such cases we will discuss with you whether and how best to proceed.

For UK and ROI Sky people may also alert the Prudential Regulatory Authority or Financial Conduct Authority. You may do this at the same time as or after you have raised your concerns internally. You do not need to raise your concerns to Sky before contacting the Prudential Regulatory Authority or Financial Conduct Authority.

Confidential Helplines

In the event that you wish to raise your concern but maintain your anonymity, please use the external confidential helpline: 0080033991345

An email and web portal are also available to any Sky person in any jurisdiction, in your local language, should you wish to make a report online. The webportal and email address are as follows:

Web URL: <https://wrs.expolink.co.uk/sky>

Email Address: sky@expolink.co.uk

For UK employees, the following external charity may be contacted:

Public Concern at Work (Independent Whistleblowing Charity) : www.pcaw.co.uk

Helpline: (020) 7404 6609

E-mail: whistle@pcaw.co.uk

Whistleblowers Champion

Sky PLC has appointed Michael Barley as the Whistleblowers' Champion to represent the Sky UK And ROI Sky People. He has responsibility for ensuring and overseeing the integrity, independence and effectiveness of Sky's policies and procedures on whistleblowing.

Investigation and outcome

Sky will evaluate the information and investigate all matters reported. Where you have provided your identity and if appropriate, Sky may contact you to discuss the report further.

Sky will determine the need and scope of any investigation and where appropriate give an indication of how we propose to deal with the matter. In some cases Sky may appoint an investigator (internal or external) or team of investigators including staff with relevant experience of investigations or specialist knowledge of the subject matter. The investigator(s) may also make recommendations for change to enable us to

minimise the risk of future wrongdoing.

Where you have provided your contact information, Sky will aim to keep you informed of the main progress of the investigation and its likely timescale. However, sometimes the need for confidentiality may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.

Sky recognises that where a crime or other serious event has been reported that a suspect or defendant, whether charged with an offence or not, remains innocent until and unless proven otherwise, or they have pleaded guilty to the offence. Sky also recognises that appropriate decisions may need to be taken to safeguard our people, our business and our customers, where crimes are alleged.

[External disclosures](#)

In instances where you do take the matter outside Sky, you will need to ensure that you follow the applicable rules set out in the local legislation of the country where you are based (e.g. for UK, Public Interest Disclosure Act 1998).

[Complaints of retaliation as a result of disclosure](#)

You must not suffer any detrimental treatment as a result of raising a concern. If you feel that as a result of making a disclosure you have suffered adverse treatment, you should submit a formal complaint under the Grievance Policy detailing what has happened or contact the Whistleblowers' Champion if you are based in UK or ROI.

[Monitoring and review](#)

Sky plc Audit Committee has responsibility for reviewing this Whistleblowing Policy from time to time and ensuring that procedures are in place for the proportionate and independent investigation of such matters and for appropriate follow up and that all those under Sky's control comply with it.

Sky's Group Audit, Risk Management and Compliance Department (ARMC) ensure regular audits are undertaken of Sky's activities to ensure compliance with this policy and any applicable local laws. Where there is a local monitoring board/compliance team, ARMC will be responsible for liaising with such Sky subsidiaries monitoring board/local team. Any improvements identified will be made as soon as possible.

Management at all levels are responsible for ensuring those reporting to them are aware, understand and comply with this policy.

All Sky people are responsible for the success of this Whistleblowing Policy and should ensure they use it to disclose any suspected danger or wrongdoing.

Sky people are invited to comment on this Whistleblowing policy and suggest ways in which it might be improved. Comments, suggestions and queries should be addressed to your local HR department or Compliance Department or compliance contact according to your local laws and policies. Your point of contact may change depending on your local laws and policies.

We make sure our policies are up to date and right for everyone at Sky. With this in mind, this policy will change from time to time. This policy may form part of your contract of employment. For further information please contact your local HR department.