



Statement on Modern Slavery and Supply Chain Values

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Modern Slavery Act Statement

OUR APPROACH

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, forced labor, child labor, 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 [Code of Conduct for Suppliers and Business Partners](#).

Our approach to preventing modern slavery, including human rights 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 on a risk-based approach. 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 labor exploitation in our businesses and supply chains in our last financial year, 1 January – 31 December 2021. The term “Comcast” as used in this Statement refers collectively to Comcast Corporation and its subsidiaries, including Comcast Cable Communications, LLC, NBCUniversal Media LLC and Sky Limited insofar as this Statement relates to the activities of those respective entities or their subsidiaries.

Sky, as a large company headquartered in the UK, provides additional detail on its efforts to address modern slavery in its Annual Modern Slavery Update.

OUR STRUCTURE, BUSINESSES AND SUPPLY CHAINS

Comcast is a global media and technology company with approximately 189,000 employees worldwide and three primary businesses: Comcast Cable, NBCUniversal, and Sky.

Modern Slavery Act Statement

We are principally focused on connectivity, aggregation and streaming with customer relationships in the United States and Europe. We deliver broadband, video and wireless through our Xfinity, Comcast Business and Sky brands; create, distribute and stream leading entertainment, sports and news through Universal Filmed Entertainment Group, Universal Studio Group, Sky Studios, the NBC and Telemundo broadcast networks, Peacock, NBC News, NBC Sports, Sky News and Sky Sports; and provide memorable experiences at Universal Parks and Resorts in the United States and Asia. NBCUniversal also licenses its intellectual property to third parties to create games and manufacture toys and apparel related to its content.

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

OUR POLICIES AND CONTROLS

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 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. We live our core values by conducting ourselves in a way that maintains trust and respect around the globe.

The Code of Conduct reaffirms our commitment to fair employment practices and promoting respect for human rights within our businesses and supply chains. Our Code of Conduct requires all

Modern Slavery Act Statement

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.

The Code of Conduct is published in 15 languages and dialects 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 Code of Conduct for Suppliers and Business Partners

Our [Code of Conduct for Suppliers and Business Partners](#) (“Supplier Code”) set the standards applicable to our suppliers and business partners across the enterprise and codifies our expectation 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.

Our Supplier Code sets forth our expectations of suppliers and business partners to treat people fairly and with respect and to provide all workers with a safe, secure, and healthy working environment. Our Supplier Code also incorporates several International Labour Organization (ILO) Conventions including prohibitions on discrimination and harassment, prevention of forced labor and human trafficking, prevention of underage labor, freedom of association, and the establishment of wage and benefits standards such as no recruitment fees or costs charged to workers.

In last year’s Statement, we discussed our preparation for a proactive campaign across the enterprise to directly communicate and stress the importance of our Supplier Code. In 2021, we launched a Responsible Procurement program, and sent letters to certain enterprise suppliers and business partners reiterating our expectations, as set forth in the Supplier Code, and highlighting our expectation that they, their workers, and their subcontractors

Modern Slavery Act Statement

conduct business consistent with our Human Rights Statement and in accordance with applicable laws and regulations regarding labor and employment. In 2022, we advanced our Responsible Procurement program and initiated a supplier due diligence campaign that utilizes a third-party ratings company to collect CSR and sustainability data from our suppliers and map the findings to our Supplier Code. There are several related initiatives currently underway and our business units, including Comcast, NBCUniversal and Sky, are working closely with our suppliers in furtherance of our Responsible Procurement goals.

Business Unit Policies

In addition to our enterprise Code of Conduct and Supplier Code, we have business unit policies relevant to human rights and labor exploitation.

Sky maintains a [Human Rights Policy Statement](#) that commits Sky

to identifying, understanding, and addressing the risks of child labor, forced labor and human trafficking in its own operations. Sky's approach to human rights is based on the International Bill of Human Rights, the ILO Conventions, UN Guiding Principles on Business and Human Rights and the Children's Rights and Business Principles. Sky recently updated this policy to reflect the ten principles of the United Nations Global Compact, and to adopt the "Employer Pays Principle" which requires that recruitment costs be paid by the employer, not workers. The revised policy also reaffirms Sky's commitment to provide a safe, clean, healthy, and sustainable environment for workers, which was recognized as a human right by the UN Human Rights Council in October 2021. Sky also maintains its Conflict Minerals policy, which sets out Sky's expectations for relevant suppliers and Sky's commitment to the responsible sourcing of tin, tantalum, tungsten and gold.

NBCUniversal maintains a global Human Rights and Modern Slavery

Modern Slavery Act Statement

policy applicable to all NBCUniversal business units and employees, which references both the International Bill of Human Rights and the UN Guiding Principles. The policy makes clear that exploitative practices should not be tolerated in NBCUniversal's operations and supply chains and reminds employees where they can report concerns.

Comcast Cable is also developing a tailored Human Rights and Modern Slavery policy to enhance its existing policy framework. The policy will apply to all Comcast Cable businesses and employees globally and is expected to launch in 2022

Training

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 its 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. Our enterprise Anti-Bribery and Anti-Corruption course also provides guidance to employees on how to identify "red flags," several of which are also indicators of risk for modern slavery and labor exploitation.

During 2021, the enterprise also prepared for new U.S. importation legislation linked to anti-forced labor initiatives and will continue to update its diligence efforts and processes during 2022.

Individual businesses continue to develop guidance on ethical relationships with suppliers and modern slavery tailored to their business needs. NBCUniversal includes materials on human rights and modern slavery as part of in-person training delivered by its legal teams to employees.

In 2021, Sky's Group Supply team underwent a series of training

Modern Slavery Act Statement

sessions on responsible sourcing, including upholding human rights and managing supplier improvement programs. Sky also continued its emphasis on training to guard against the risk of modern slavery in its construction projects in partnership with Stronger Together. In 2021, Sky provided a full-day modern slavery prevention training session for contractors and suppliers hired for the construction of Sky Innovation Centre and Sky Studios Elstree. Suppliers in Sky's product supply chain were also provided with a wide range of training materials from the Responsible Business Alliance and Responsible Minerals Initiative that they could in turn leverage with their direct and indirect manufacturing suppliers in Asia and Europe.

Risk Assessments

Risk assessments are a critical component of our enterprise risk management and business unit compliance programs. Our enterprise compliance risk management program specifically requires each business unit to assess the risk of modern slavery in

their businesses. Our risk management program also includes other areas pertinent to modern slavery, including third-party risk management and anti-bribery and anti-corruption.

In 2021, Comcast Cable commenced a risk assessment of its businesses, with a particular focus on relevant risks such as third-party risk management, anti-bribery, international trade, privacy and consumer protection issues. As part of this risk assessment, Comcast Cable examined the processes around the onboarding and monitoring of third parties and subcontractors and specifically reviewed third parties hired outside of the United States to verify compliance with internal processes.

NBCUniversal conducts an annual risk assessment focusing on a number of different risk areas, including modern slavery and labor exploitation risks. The output of this exercise informs the following year's activities.

Modern Slavery Act Statement

Sky's annual modern slavery risk assessment approach constantly evolves based on learnings from prior risk assessments, findings from investigations, and feedback from workers and other stakeholders. Sky has also developed a modern slavery risk assessment tool that draws on information gathered from risk assessments around the business to identify target mitigations and track progress towards them. In 2021, Sky Updated its Response Protocol for modern slavery and labor exploitation incidents to provide further guidance on remedial actions. Sky's modern slavery risk assessment and Response Protocol are overseen by Sky's Human Rights Leadership Group.

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. 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. 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. Our speak up program remained unaffected by the ongoing pandemic with dedicated professionals continuing to investigate any concerns or allegations made through the portal or hotline. Our employee engagement surveys provide an additional forum for employees to raise issues and express concerns.

Modern Slavery Act Statement

In 2021, Sky also launched a Group-wide support helpline, Skyline, for work-related security and safety concerns. The helpline offers 24-hour assistance and is available to all Sky employees wherever they are located. As part of the launch of Skyline, Sky worked with its security teams to further educate on human rights issues and build potential human rights impacts into established security and safety briefings to improve the effectiveness of the helpline to manage human rights issues.

OUR ACTIONS

Comcast has adopted various approaches to protect workers from modern slavery and labor exploitation in our businesses and in our supply chains. When dealing with third parties, we seek to work only with those 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. We maintain risk-based due

diligence procedures that vary by business to achieve this objective.

Comcast Cable employs screening mechanisms and other processes to identify suppliers that may be at greater risk for modern slavery and human trafficking. If any concern with respect to a supplier is raised or identified, Comcast Cable investigates the concern and, where appropriate, in cooperation with the supplier, establishes a corrective action plan to ensure remediation. Comcast Cable further conducts due diligence on its third-party suppliers, including screening for potential sanctions and international trade issues as well as reputational issues. In 2021, Comcast Cable conducted diligence on nearly 800 new and existing third-party suppliers and will continue to expand its diligence efforts as it advances its Responsible Procurement program in 2022.

As noted in prior Statements, among the higher-risk areas of NBCUniversal's business are consumer products licensing which

Modern Slavery Act Statement

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. The risks in these areas are managed through a combination of controls, including due diligence, in-person training, and periodic auditing.

The Universal Parks & Resorts division owns and operates theme parks and resorts in the United States and Japan, and owns a minority interest in the joint venture that owns and operates Universal Beijing Resort, which has its own Head of Compliance. Universal Studios Singapore is owned and operated by a third-party company which licenses Universal intellectual property. Each wholly-owned and operated 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. Construction of a new park in Orlando, Florida recommenced in 2021, and will fall under the same management and controls as the original park in Orlando.

NBCUniversal continued its third-party factory auditing program in 2021. Under NBCUniversal's Global Brand Standards policy, NBCUniversal businesses and their agents request approval before third-party factories may produce and distribute NBCUniversal-themed merchandise. COVID-19 restrictions continued to impact the volume of requests from NBCUniversal businesses and their licensees to authorize third-party factories for production, as many third-party factories were still subject to some form of visitation

Modern Slavery Act Statement

restriction. Despite these obstacles, NBCUniversal audited approximately 1,150 factories prior to approving them for use in 2021, up from over 900 in 2020. Most of the audit findings were mitigated by working with the factory to improve standards and conditions prior to authorizing them to produce themed products. No evidence of forced labor was identified in any of the audited factories.

Sky continued with its Supply Chain Sustainability Program in 2021. In connection with the launch of Sky Glass, Sky conducted more than 100 supplier third-party ethical audits of suppliers within the Sky Glass supply chain to better understand the modern slavery risk profile associated with the new product. Sky also continued its broader audit program, utilizing third-party Responsible Business Alliance (RBA) audits prior to contracting with high-risk suppliers in the Sky product supply chain. Through RBA auditing, Sky discovered instances of migrant workers paying recruitment fees. In response, Sky offered training on responsible recruitment to the supplier and required that all fees be repaid to the workers as a condition of any

further business with Sky. After learning that some of the workers had not yet been reimbursed, Sky moved its business to a different supplier and set up a fund to pay back the workers that did not receive reimbursement of the recruitment fees directly from Sky's former supplier.

In 2021, Sky resumed site visits with suppliers, which had been challenging in the prior year due to the pandemic. Based on learnings from the site visits, Sky is developing a training program for Sky employees who may go on site to help the employees identify red flags and how to appropriately escalate them. Sky is also developing a suite of key performance indicators (KPIs) to monitor the effectiveness of its human rights due diligence.

Last year, we also discussed Sky's focus on its merchandise purchasing practices. In 2021, Sky adapted its purchasing practices for branded merchandise following a human rights and environmental review of its suppliers.

Modern Slavery Act Statement

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. Through the Forum, NBCUniversal and Sky commission research into labor practices on UK TV productions, with a particular focus on ancillary workers such as those providing cleaning, catering, security, transport, facilities, and construction services on production sets. The research involves a combination of desktop research, site visits, interviews with production teams, and direct engagement with workers. Along with other industry peers, NBCUniversal and Sky are now supporting the development and piloting of tools, such as procurement checks, to improve working conditions for TV production workers. This will become a published production toolkit aimed at enabling UK broadcasters and commissions to share best practices relating to combatting modern slavery and labor exploitation.

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, including providing feedback and industry insight directly to the UK Home Office, attending industry roundtable meetings to discuss the practicalities of planned changes, and agreeing to trial the new Home Office Modern Slavery registry where in-scope businesses will be required to upload future statements. Sky is also a founding participant and an active member of the Business Against Slavery Forum, meeting with the Home Office to discuss modern slavery, including how to encourage industry peers and other companies to improve their disclosures under the Modern Slavery Act and to address modern slavery risks in their businesses. In 2021, NBCUniversal also joined Sky as a member of the Centre for Sport and Human Rights' Advisory Council.

Modern Slavery Act Statement

We 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 again worked with [Unseen UK](#), a charitable organization focused on identifying and supporting victims of modern slavery, on a number of awareness-raising initiatives during 2021. Sky and NBCUniversal also continue to financially support the UK Modern Slavery Helping, which is run by Unseen.

Modern Slavery in the Waste & Recycling Sector

As part of its membership with the Indirect Procurement Human Rights Forum, Sky jointly published a [Waste and Recycling Sector Modern Slavery Toolkit](#) in October 2021. The toolkit provides practical guidance for areas of the business that may encounter the warning signs of modern slavery such as Human Resources, Procurement, Operations and technical staff and Corporate Responsibility and/or Corporate Sustainability. The toolkit includes general information on modern slavery and identifies the heightened risks of modern slavery in the waste and recycling sector (including in the e-waste, textile waste, plastics, and metals sectors). The toolkit further provides a checklist, an example responsibility matrix, and other best practices for businesses of any size to implement effective management systems to prevent, detect, and report modern slavery. Sky currently uses the toolkit to engage its own operational waste suppliers.

Modern Slavery Act Statement

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

Tom Reid

Thomas J. Reid

Director

June 14, 2022