

Sky's Government Engagement Policy

Principles

Across the Sky Group, our Government Engagement Policy is underpinned by the following guiding principles:

- Sky engages with governments, their agencies and representatives in order to communicate about matters relating to Sky's business.
- It is a necessary requirement of all those engaging with governments on Sky's behalf (including third parties) to act within our guidelines for transparency and accountability and the Company's standards of responsible business outlined in Sky's Ways of Working document.
- Sky does not make donations to political parties.

Accountability

Across the Sky Group, the responsibility for government engagement lies with the Public Affairs and Policy Team. The Group Director of this team is directly accountable to the Chief Executive, who are both accountable to the board. The board is responsible for the direction and oversight of Sky plc on behalf of its shareholders and is accountable to them, as owners, for all aspects of Sky's business. The board recognises that in conducting its business, Sky should be responsive to other relevant constituencies.

We uphold a commitment to conducting our business fairly, with respect, honesty and integrity. We expect that any employee or third party will maintain high standards of ethical behaviour and transparency and raise any concerns as early as possible – this process is outlined in our group-wide Whistleblowing Policy.

Sky has a zero-tolerance approach to bribery and corruption as outlined in Sky's Ways of Working document.

Transparency

We share our industry expertise to contribute to discussions with the UK government on a range of public policy issues. We respond to public consultations from various government departments and accept invitations to appear before select committees, parliamentary groups and policy panels to outline our insights and perspectives on industry issues.

Members of our senior public affairs and policy teams respond to requests for information about our policy positions, provided doing so doesn't compromise commercial sensitivities.

Donations

Sky does not make donations to political parties and we do not allow employees to knowingly make any political contributions to individuals or political parties on Sky's behalf. In cases where Sky employees are unsure whether something may be seen as a political contribution, the Company Secretary is able to give advice. Sky have never employed or made payments to a serving politician.

Senior management have oversight of all expenditure on public policy activity by Sky's Public Affairs and Policy Team. These controls undergo regular monitoring to ensure that all expenditure, including payments to approved third parties, follow appropriate due diligence.

Third Parties

We get involved at a local, national and European level and through a number of trade organisations. When engaging with any third party or intermediary, partners are required to comply with both the appropriate regional laws and Sky's own Ways of Working. At Sky we constantly regulate any activity with third parties to ensure they are acting in the company's best interest at all times. Sky will terminate any membership that breaches our core values or that no longer aligns with our policy objectives.

The partnerships we foster with public policy groups including industry trade bodies are an important part of our public affairs activity, therefore we aim to ensure that Sky is working with credible and respected organisations that align with our company's core values and meet the following criteria:

- 1) The group has a robust governance processes
- 2) Funds provided by Sky will not be misused in the form of political contributions or for other inappropriate uses
- 3) The membership continues to provide value to our organisation
- 4) The group has a consistent and credible reputation with other key external stakeholders

A regularly updated, comprehensive list of the organisations Sky currently has membership with is as follows:

- The Internet Advertising Bureau (IAB)
- Advertising Association
- Internet Watch Foundation
- Media Smart
- Commercial Broadcasters Associations (COBA)
- Tech UK
- European Group of Television Advertising (EGTA)
- Internet Service Providers' Association (ISPA)
- Broadband Stakeholder Group (BSG)
- The Independent Networks Cooperative Association (INCA)
- UK Competitive Telecommunications Association (UKCTA)
- Parliamentary Internet, Communications and Technology Forum (PICTFOR)
- UK Spectrum Policy Forum
- Business Consumer Coordination Group

Conclusion

We believe this to be a full record of the Sky Group policy towards engagement with government. We make it publicly available on our website to all members of staff alongside all other key governance policies.

Please contact Sky's Public Affairs team with further questions.