

# Sky's Responsible Sourcing Policy

## Introduction

Sky is committed to the highest possible standards of human rights, environmental, ethical and social responsibility performance in respect of all its products and services. Sky strives to be the best for its customers and its people, and looks to make a positive contribution to society.

This Responsible Sourcing Policy document (the "Policy") provides details of the human rights, environmental, ethical and social responsibility standards that Sky expects its suppliers to adhere to, in order to support Sky's commitment to delivering the best possible products and services. It includes specific detail on standards in relation to combatting modern slavery.

Suppliers are expected to adhere to these standards at all times. Sky aims to be a good partner in return, and will work with suppliers to support any necessary improvements, encourage continual improvement, and reward good performance. Consequently, if a supplier falls short of this Policy, Sky will expect this supplier, working collaboratively with Sky, to rectify issues and make appropriate changes. If a supplier is unwilling to work in this way then Sky may, at its discretion, discontinue the relationship with that supplier.

## Aim

The purpose of this Policy is to ensure that Sky receives from suppliers, and delivers to its customers, high-quality, trusted products and services. It is also intended to show how to minimise any negative impacts and to enhance the positive environmental, ethical and human rights impacts associated with Sky activities, products and services. For the purpose of this Policy, the term "supplier" is used to describe any company that has contracted (or is intending to contract) with Sky for the supply of products and/or services.

Sky acknowledges that working closely with its stakeholders, including suppliers and other business partners, will inspire innovation in the nature and quality of products and services, which will ultimately enable a better experience to be delivered to all customers.

## Suppliers' Requirements

### 1. *Complying with the law is non-negotiable*

Sky expects the full engagement and commitment of its suppliers in fulfilling and discharging any legal obligations that exist or that arise in connection with human rights, environmental, ethical and social legislation, any contractual arrangement(s) and Sky company policies. The suppliers will also ensure they understand where in their operations and supply chains are the highest risks in terms of human rights, environmental, ethical and social issues and that they address them with the highest care and priority.

Sky expects each of its suppliers to adhere to the Policy throughout its supply chain and with all subcontractors used to supply to Sky. To this end, the supplier will ensure that all relevant requirements of the Policy are addressed with subcontractors and third parties in its supply chain, mirroring terms in any contractual arrangements with each subcontractor and/or third party as needed.

## Environmental management

### 2. *Good environmental management is good business*

Without limiting any other provision of this Policy or of any contract or obligation that the supplier has entered into with Sky, it is expected that the supplier will at the very least, across its own operational processes and also any products and services supplied, meet all applicable local, national and international environmental regulations and provide evidence accordingly, as needed. All required environmental permits, licences, information registrations and restrictions will be obtained, and their operational and reporting requirements followed and maintained. Suppliers are expected to notify Sky promptly of any breach of, or other failure to comply with, any applicable environmental law or regulation and indicate the proposed remedial and/or corrective action to be taken.

### 3. *Single-use Plastic*

Sky has committed to business goals of removing single-use plastic from its operations, products and supply chain. As part of your work with Sky, you are expected to collaborate on avoiding using single-use plastics in the delivery of your products and services to us. Please refer to our Single-use Plastic Policy for more detail.

### 4. *Less is more: cut emissions and waste*

Suppliers shall also operate in an environmentally responsible and efficient manner to minimise adverse impacts on the environment, whilst ensuring safe handling, movement, storage, recycling, reuse, or management of waste, air emissions and wastewater discharges and preventing any spills/releases. We strongly encourage our suppliers to conserve natural resources and consider the reusability/recyclability of their products and services.

## Ethical and Social Responsibility

Notwithstanding the requirements of local, national and international laws, regulations and best practice regarding ethical, social and human rights conditions (such as labour and working conditions, health and safety, and bribery and corruption), Sky expects all suppliers to act with the highest possible regard for social responsibility.

Without limiting any other requirement of this Policy, or a supplier's contract with Sky, each supplier is expected to conduct its business with integrity and prohibit bribery, or other means of obtaining undue advantage, whether directly or indirectly. Suppliers are also expected to manage any supply chain responsibly, encouraging sub-suppliers to take positive actions to

### **5. Treat everyone fairly and equally**

- Respect the human rights of all employees and the rights of the communities in which they operate and understand where in operations and supply chains are the highest risks of human rights abuses occurring;
- Ensure employees are treated well and respect human rights. Corporal punishment, abuse, harassment or intimidation of employees on any grounds is completely unacceptable. Disciplinary policies and procedures shall be clearly defined and communicated to all workers;
- Ensure that it does not discriminate by age, race, sex, national origin, religion, disability, pregnancy, medical condition, marital status or sexual orientation in respect of its hiring, pay, development, termination or retirement policies – or on any grounds other than fitness for the job;
- Allow the right to form or join Trade Unions (as may be relevant or desired) and to bargain collectively, according to national law. Where the right to freedom of association and collective bargaining is restricted or prohibited under law, suppliers must not hinder workers from developing alternative mechanisms to express their grievances and protect their rights regarding working conditions and terms of employment.
- Allow free and confidential access to remedy/grievance mechanisms.

### **6. Coming to work should be a choice**

- Ensure that all employees can make a free choice about their employment: there should be no illegal, forced, bonded, involuntary or exploited labour - workers shall have the freedom to terminate their employment without fear of penalty;
- Ensure there is no involvement in incidences of human trafficking or involuntary movement of persons for exploitation. Ensure migrants are hired directly whenever possible or, if having to subcontract, ensure that the labour agencies used operate legally, are certified or licensed by the competent authority and that they have practices in place to ensure that workers have not been trafficked;
- Ensure that workers are not charged any fees or costs for recruitment nor required to lodge “deposits”; confiscating or withholding worker identity documents or other valuable items, including work permits and travel documentation (e.g. passports), is prohibited and workers’ freedom of movement shall not be unreasonably restricted.

### **7. Fair pay for sensible hours**

- Pay wages which at least meet minimum national legal standards or the appropriate industry benchmark standards, whichever is the higher;
- Ensure overtime work is used responsibly and compensated fairly;
- Ensure that everyone is working in a recognised employment relationship as defined by law, and explain clearly to employees the terms and conditions of their employment and the expected work output to which their wages relate, in a language understood by employees;
- Ensure employees do not work hours in excess of the limitations set by relevant local and national laws and regulations, as well as international best practice. We expect suppliers to go beyond legal requirements to restrict both working and overtime hours in line with the guidance specified in the Ethical Trading Initiative, and by providing a commitment to all workers for appropriate rest days during any relevant working period or block. All overtime should be voluntary. No worker shall be made to work overtime under the threat of penalty, as a disciplinary measure or for failure to meet production quotas.

### **8. Workers are of an appropriate age**

- Meet the requirements of the ILO Convention prohibiting the Worst Forms of Child Labour;
- Meet the requirements of the ILO Convention on Minimum Age, including those regarding minimum age, appropriate types of work for young workers, hours of work, health and education concerns;
- Ensure that if suppliers do find that they have children working for them, to have policies and plans in place to remedy the situation in a way that does not jeopardise the children affected and supports them to continue in education;
- Ensure the health and safety of young workers, precluding them from hazardous and night work.

### **9. Work shouldn't harm your health**

- Provide a safe and hygienic workplace, taking adequate and necessary steps to prevent accidents and injury to health, and to appoint a senior employee as a health and safety representative;
- Engage staff in health and safety education, providing regular and recorded training, especially to new or reassigned workers;
- Provide clean toilet facilities, potable water and clean and safe food storage and accommodation where appropriate;
- Ensure there are effective and clear communications between managers and employees.

### **10. Communicate with transparency and openness**

The supplier is expected to ensure that all necessary and reasonably required data and reporting is produced in a complete, accurate and timely fashion to enable Sky to complete its own reports and submissions to any relevant authority.

### **11. Working with us and the wider supply chain to continuously improve**

Any chosen supplier will be required to complete annually (or at such other time as required by Sky), the Sedex<sup>1</sup> Responsible Sourcing Questionnaire, which aims to ensure that all data recorded in the Sky database is maintained up to date and that Sky is provided with evidence of compliance against the requirements of this Policy.

<sup>1</sup> Sedex is the Supplier Ethical Data Exchange, a not for profit membership organisation dedicated to driving improvements in responsible and ethical business practices in global supply chains. Data disclosed in Sedex is treated confidentially and can only be shared between companies who are in a supply chain relationship. Access is only granted to member companies within the supply chain, following a supplier driven approval process.