



Statement on Modern Slavery and Supply Chain Values

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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. 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 2020. 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 [2021 Modern Slavery Update](#) on Sky's website.

OUR STRUCTURE, BUSINESSES AND SUPPLY CHAINS

Comcast is a global media and technology company with approximately 168,000 employees worldwide and three primary businesses: Comcast Cable, NBCUniversal, and Sky.

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We are principally focused on broadband, aggregation and streaming with over 56 million customer relationships across 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, multiple cable networks, Peacock, NBCUniversal News Group, NBC Sports, Sky News and Sky Sports; and provide memorable experiences at Universal Parks and Resorts in the United States and Asia.

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 business and supply chains. Our Code of Conduct requires all

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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 we continuously strive for the highest standards of integrity in our business practices. Our employees are required to acknowledge and receive training on the Code of Conduct.

Comcast Code of Conduct for Suppliers and Business Partners

In last year's statement, we discussed the publication of the [Comcast Code of Conduct for Suppliers and Business Partners](#) ("Supplier Code"), which set standards applicable to our suppliers and business partners across the enterprise. This allowed us to unify in one place the already existing expectations and standards in our

business units 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 2020, we began preparations for a proactive campaign across the enterprise to directly communicate and stress the importance of our Supplier Code. As part of that effort, we sent a targeted

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communication to Comcast's largest 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 conduct their business consistent with our Human Rights Statement and in accordance with applicable laws and regulations regarding labor and employment.

Our 2021 strategy includes developing a Responsible Procurement Initiative that includes collecting due diligence through supplier questionnaires and self-assessments that are mapped to our Supplier Code. We plan to assess our supplier ecosystem against key supplier ethical and sustainability metrics reported through third party rating platforms and consider those metrics in our future development of risk-based KPIs.

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. For example, 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. The Human Rights policy is reviewed and updated periodically by Sky's Human Rights Leadership Group, which is a senior leadership group comprising representatives from across the business. In 2021, Sky published a Conflict Minerals policy, which sets out Sky's expectations of relevant suppliers and commitment to responsible sourcing of tin, tantalum, tungsten and gold, and builds on Sky's work with the Responsible Minerals Initiative to map supply chains and validate smelters and refiners.

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In 2020, NBCUniversal launched a global Human Rights and Modern Slavery 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. In 2021, NBCUniversal intends to build on this policy foundation by creating additional guidance and training documentation relating to identifying and mitigating modern slavery risks for its content production groups.

Training

In 2020, we redesigned our enterprise training program to remain in step with the newly updated Code of Conduct, which includes fostering ethical relationships with Suppliers and other Business Partners as one of its core principles. We also redesigned our enterprise Anti-Bribery and Anti-Corruption course, which includes

guidance to employees on how to identify "red flags," several of which are also indicators of risk for modern slavery and labor exploitation.

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 2020, following the publication of the Australian modern slavery legislation, NBCUniversal conducted targeted employee training for its Australian groups. NBCUniversal also provides in-person training to third-party production companies using a risk-based approach, which includes strategies for identifying and mitigating human rights and modern slavery risks on set.

In addition to our internal training development, we leverage

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external training resources to inform our approach. Sky's product supply chain team, for instance, partnered with Dr. Alicia Kidd of University of Hull, whose research focuses on modern slavery and human trafficking, to pilot relevant training with key logistics partners, including several indirect suppliers, in the UK through online workshops.

Training has also been an important component of the Sky Labs construction project, which is expected to finish in 2021. Sky is a sponsor of Stronger Together's Construction Program, a multi-stakeholder initiative to address modern slavery in the construction sector, through which Sky can contribute to the development of best practices in its commissioned construction projects. In furtherance of that commitment, Sky hosted two full-day Stronger Together workshops in 2020 to learn about risks of modern slavery in UK construction and discuss mitigation strategies for the Sky Labs and Sky Studios Elstree projects.

Risk Assessments

Risk Assessments are a critical component of our enterprise risk management and business unit compliance programs. Our risk assessments touch on several areas pertinent to modern slavery including third-party risk management and anti-bribery and anti-corruption. In 2020, NBCUniversal commenced a risk assessment of its businesses, with a particular focus on third party risk, anti-bribery, and international trade. The risk assessment identified the scope of third parties and the jurisdictions in which they work, as well as the business unit's due diligence processes around both the primary third party and any potential sub-contractors. In 2021, NBCUniversal expects this risk assessment to be expanded to explicitly include modern slavery and exploitation risks. Similarly, Comcast Cable is conducting risk assessments of its businesses in areas such as anti-bribery, consumer protection regulation, international trade, and privacy, among others, with each assessment focusing on third-party risk.

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In addition to our routine third-party risk assessment processes, our businesses conduct assessments specifically tailored to modern slavery. Sky annually conducts a modern slavery risk assessment process as part of its broader human rights risk assessment. Sky has also developed a modern slavery risk assessment tool that includes target mitigations and progress towards them. The tool draws on information gathered from risk assessments around the business. Sky's risk assessment is reviewed by the Human Rights Leadership Group and draws on input from various human rights organizations and rightsholders.

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 program. Our program provides 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 helpline and web portal are available in 15 languages and dialects and are publicized in our Code of Conduct and Supplier Code, both of which are available on our corporate website. Our speak up program has remained available throughout the pandemic with dedicated professionals continuing to investigate concerns and allegations made through the helpline and portal.

Our employee engagement surveys provide an additional forum for

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employees to raise issues and express concerns. We continued to engage our employees through surveys even after most transitioned to working remotely in 2020 due to the pandemic.

OUR ACTIONS

Comcast has adopted various approaches to protect workers from modern slavery and labor exploitation in our business 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.

Among the higher-risk areas of NBCUniversal's business are consumer products licensing which 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. Universal Studios Singapore is owned and operated by a third-party company which licenses Universal intellectual property. Each 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

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adhere to all local labor laws, including standards prohibiting modern slavery, as a condition of the contract. A new park in Beijing, China is scheduled for opening in 2021. Universal Beijing Resort will be operated to the same standards as the other Universal resorts and will also have its own Chief Compliance Officer. Construction of another new park in Orlando, Florida will recommence in 2021, after delays associated with the pandemic, and will fall under the same management and controls as the current Orlando park.

NBCUniversal continued its auditing program in 2020. 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 impacted the volume of requests from NBCUniversal businesses and their licensees to authorize third-party factories for production, as many third-party

NBCUniversal Case Study: Industry and Charitable Organization Partnership

In the Summer of 2020, NBCUniversal's Brand Development ("UBD") division was contacted by the [Clean Clothes Campaign](#) ("CCC"), a transnational charitable organization supporting and advocating for the rights of workers in the textiles industry. CCC alleged that garments featuring NBCUniversal intellectual property had been produced by Burmese workers in Thailand who were paid below minimum wage, forced to work overtime, and owed wages by a factory owner when the factory closed after a [Reuters article](#) was published exposing conditions in the factory.

Through investigation, NBCUniversal identified that a licensee subcontracted part of their manufacturing (of garments branded with NBCUniversal intellectual property) to an unauthorized factory in that region without NBCUniversal's knowledge or authorization. As a result, the factory was not audited in advance per NBCUniversal's Global Brand Standards policy.

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factories were forced to scale back or cease production. NBCUniversal audited approximately 900 factories prior to approving them for use in 2020, down from over 1,300 in 2019. 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. However, 2 factories were audited and rejected in 2020 due to concerns regarding the risk of underage labor.

In 2020, Sky refreshed its approach to supply chain sustainability, establishing the Supply Chain Sustainability Program and multi-year strategy. Sky's work to improve working conditions for the most vulnerable in Sky's supply chains includes gathering data, conducting audits, engaging suppliers and stakeholders, and setting targets. Sky also piloted worker wellbeing surveys with Tier 1, or direct, strategic suppliers in 2020.

Sky conducted 45 audits in 2020, as well as monitored external

NBCUniversal Case Study: Industry and Charitable Organization Partnership

Despite NBCUniversal's multiple requests to the licensee to appropriately compensate the impacted workers immediately, the licensee made no effort to do so. Recognizing the needs of the workers and in accordance with the UN Guiding Principles on remedies, UBD made an appropriate goodwill donation to a Thai charitable organization, [the Map Foundation](#) ("MAP"). NBCUniversal's donation funded remuneration for the workers, as well as further advocacy work in Thailand. NBCUniversal expects that the workers will have been fully remediated by Q3 2021. Additionally, UBD will not sign any future deals with this licensee as they no longer meet NBCUniversal's brand standards.

NBCUniversal is grateful to CCC and MAP for their partnership, which exemplifies the potential power to combat labor exploitation through cooperation between industry and NGO/charitable sectors.

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audits and accessed audits through the Responsible Business Alliance database. Sky also attempted to adapt to the challenges of the pandemic by engaging in some trial “virtual audits.” The virtual audits allowed Sky to inspect certain aspects of supplier facilities as an interim measure until on-site audits can resume.

Sky also focused on its merchandise purchasing practices, though the COVID-19 pandemic reduced Sky’s merchandise purchasing overall in 2020. Sky reviewed more than 60 suppliers and rejected almost a third of the suppliers based on social or environmental concerns. The review was not only revelatory for Sky; some of the reviewed suppliers who were not compliant with the UK Modern Slavery Act noted that they had not realized that the legislation applied to them.

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 helped to 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 involved a combination of desktop research, site visits, interviews with production teams, and direct engagement with workers on three Sky TV productions in 2019 and 2020. The assessments did not uncover systemic issues of labor exploitation but identified areas for improvement to the production companies.

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

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Sky Case Study: Importance of Transport in Modern Slavery Victim Recovery

Sky financially supported a multi-stakeholder initiative that brought together modern slavery survivors, NGOs, academia and the private sector. The research project focused on the positive role that free/unrestricted transportation can have on modern slavery survivor recovery. Through the study, 100 modern slavery survivors were provided funded travel cards for 12 weeks (from December 2019 to February 2020). The Rights Lab from Nottingham University researched the resulting impact on survivors' recovery.

The study and its findings were published in a report called '[Going Places: Journeys to Recovery](#)' in December 2020. The Rights Lab used the study to provide recommendations to the UK government to offer funded travel as part of the package of support in the UK's victim care scheme. Sky will continue to support coordinated approaches to survivor recovery through its role on the Business Against Slavery Forum.

aimed to enable UK broadcasters and commissions to share best practices relating to modern slavery and labor exploitation. In 2021, the Forum has commissioned research from Human Rights consultancy firm Romanac Consulting Limited into the intersection of news and sports and human rights/modern slavery risks, which impact our business.

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

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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 regularly 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.

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 worked with [Unseen UK](#), a charitable organization focused on identifying and supporting victims of modern slavery, on a number of awareness-raising initiatives during 2020, as well as providing care packs and festive presents for survivors in Unseen's care. Sky and NBCUniversal also continued to financially support the UK Modern Slavery Helpline, which is run by Unseen.

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 9, 2021