



# Statement on Modern Slavery and Supply Chain Values

Published June 2024

# 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 violations 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 fiscal year, 1 January – 31 December 2023. 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 as far 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 Human Rights and Modern Slavery Update.

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## OUR STRUCTURE, BUSINESSES AND SUPPLY CHAINS

Comcast is a global media and technology company that reaches customers, viewers and guests worldwide through the connectivity and platforms services we provide and the content and experiences we create. We deliver broadband, wireless, video and voice services primarily under the Xfinity, Comcast Business and Sky brands; produce, distribute and stream leading entertainment, sports and news through brands including NBC, Telemundo, Universal, Peacock and Sky; and own and operate Universal theme parks.

We operate two primary businesses:

- **Connectivity & Platforms:** Contains our broadband, wireless, video and wireline voice businesses in the United States, United Kingdom and Italy (collectively, the “Connectivity & Platforms markets”). Also includes the operations of our Sky-branded entertainment television networks in the United Kingdom and Italy. Our Connectivity & Platforms business is reported in two segments, Residential Connectivity & Platforms and Business Services Connectivity.

- **Content & Experiences:** Contains our media and entertainment businesses that produce and distribute entertainment, sports, news and other content for global audiences and that own and operate theme parks and attractions in the United States and Asia. Our Content & Experiences business is reported in three segments, Media, Studios and Theme Parks.

Connectivity & Platforms includes all of Comcast Cable and Sky’s connectivity businesses while Content & Experiences primarily encompasses NBCUniversal and Sky Sports.

## 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.

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## **Comcast Code of Conduct**

Our [Code of Conduct](#) provides the framework for what we stand for and how we operate. It defines our principles of business conduct and reflects our shared commitment to 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 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 global standards relating to human rights.

## **Comcast Code of Conduct for Suppliers and Business Partners**

Our [Code of Conduct for Suppliers and Business Partners](#) (“Supplier Code”) sets 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 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 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.

Additionally, while Comcast does not directly purchase raw minerals, we encourage our suppliers to avoid the use of conflict minerals in the manufacture of products and to engage in appropriate due diligence, as set

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as set forth in our [Conflict Minerals Policy Statement](#).

As noted in last year's statement, we continued to advance our Responsible Procurement program in 2023 and initiated a supplier due diligence campaign. We continued to communicate directly with our suppliers and business partners across our global ecosystem about our Supplier Code and our expectation that they, their workers, and their subcontractors conduct business in a manner consistent with our [Human Rights Statement](#) and in accordance with applicable labor and employment laws and regulations. Additionally, we expanded our collection of supplier and business partner corporate social responsibility and sustainability information and have deployed a centralized management tool to conduct supplier outreach and manage supplier and business partner-specific information.

Our business units, including Comcast, NBCUniversal and Sky, continue to work 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.

Comcast Cable published its Human Rights Policy applicable to all Comcast Cable business units and employees. The policy adheres to the UN Guiding Principles on Business and Human Rights and reaffirms Comcast's commitment to preventing human rights violations and labor exploitation in the Cable business and supply chains.

NBCUniversal maintains 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 on Business and Human Rights. The policy makes clear that exploitative practices will not be tolerated in NBCUniversal's operations and supply chains and reminds employees where they can report concerns.

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Sky maintains its [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 also published its [Declaration of Principles on Human Rights and the Environment](#) in alignment with the German Supply Chain Act. In it, Sky outlines its commitments, risk assessment and management approaches and processes, which build on Sky's overall approach to meeting growing regulatory requirements. 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.

## Training

Central to our enterprise training program is our Code of Conduct. 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.

Additionally, individual business units continue to develop guidance for suppliers on ethical relationships and modern slavery tailored to their business needs.

NBCUniversal included materials on human rights and modern slavery as part of in-person training that its legal teams delivered to employees and business partners. NBCUniversal also provided targeted training to its Australian businesses, following the passage of the Australian Modern Slavery Act.

In 2023, Sky continued to administer training focusing on human rights due diligence, governance, implementation of the UN Guiding Principles on Business and Human Rights, forced labor and wider human rights risks

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including prevention and mitigation measures. Trainings were provided as part of memberships in the Indirect Spend Alliance, the Unseen Business Hub, the Responsible Business Alliance (RBA), which is “the world's largest industry coalition dedicated to supporting the rights of workers and communities affected by global supply chain issues,” and the TV Industry Human Rights Forum. Training was also provided to support the implementation of Sky's “Preventing Labour Exploitation in Construction Programme.” The trainings were delivered to certain teams, including the Human Rights Leadership Group, procurement, supply chain, customer service, production partners, indirect and direct suppliers, and Human Resources. Similar training was provided that specifically focused on meeting the requirements of the German Supply Chain Act. Sky also engaged with certain direct electronics manufacturing service suppliers to build and improve capabilities and to further embed due diligence into those suppliers’ operations and supply chains.

## **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 and the controls in place to ensure adequate actions are being taken to prevent such risk. Our risk management program also focuses on risks in other areas pertinent to modern slavery, including anti-corruption and sanctions/international trade controls.

In 2023, Cable deployed expanded due diligence processes that increased the number of suppliers subject to diligence focused on human rights practices. Comcast Cable’s 2023 modern slavery risk assessment focused on the Cable business’ third-party manufacturing supplier relationships located outside of the United States. The review assessed Comcast Cable’s governance structure supported by its public commitments and expectations that employees adhere to the principles outlined in Comcast Cable’s Human Rights Statement, as well as its internal policies, including the Code of Conduct. Both the public statements and internal policies reaffirm Comcast Cable’s commitment to fair employment practices and promoting respect for human rights within its business and supply chains. Comcast Cable continues to utilize RBA resources, including verified audits,

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to support its compliance efforts. The risk assessment also confirmed that Comcast Cable's communications practices both internally and with our key suppliers includes supplier outreach to participate in or share their EcoVadis assessment scores.

NBCUniversal refreshed its compliance risk management assessment and will continue to focus future assessments on areas including labor exploitation, modern slavery, human rights, and international trade controls.

Sky's annual human rights and risk assessment process was updated in 2023 with a third party-supported review of salient human rights issues. This process involved interviews of relevant stakeholders across the business, including external stakeholders, to inform its annual risk register and risk assessment approach for operations in the UK, Germany and Italy. The review supported the development of Sky Deutschland's [Declaration of Principles on Human Rights and the Environment](#), published at the end of 2023. Sky further developed its modern slavery and human rights risk register and incorporated it into its compliance risk management processes.

In 2023, Sky's risk assessments were aligned with the German Supply Chain Act, focusing on forced and child labor and wider human rights and environmental risks.

## 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 our supply chains, through our [Comcast NBCUniversal Listens and Sky Listens](#) programs. Our programs provide several channels for speaking up without fear of retaliation, including a helpline and web portal that are administered by an independent third-party company. A violation of the Code of Conduct or a Company policy may result in disciplinary action for our employees, including but not limited to termination of employment, impact to compensation, or other appropriate action, regardless of an employee's title or tenure. Our Code of Conduct prohibits retaliation against those who in good faith raise a concern or participate in the investigation of suspected illegal or unethical conduct.



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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 is supported by dedicated professionals who investigate allegations or concerns raised through the portal or hotline. Employee engagement surveys provide an additional forum for employees to raise issues and express concerns. As shown in those surveys, our employees are aware of how to report ethical concerns or observed misconduct and believe they can report such matters without fear of retaliation. Comcast consistently monitors employee headcount and opens the hotline and web portal in countries or regions where employees require access to speak up channels.

In 2023, Comcast adopted an Enterprise EU Whistleblower Directive Policy which provides guidance for investigating alleged violations of EU law, including allegations of modern slavery and human rights violations, in compliance with the requirements of the EU Whistleblower Directive.

## **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 with those who are legitimate and reputable, qualified to perform the services for which they are engaged, and share Comcast's commitment 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 continues to update its diligence efforts and processes in conjunction with new U.S. importation legislation linked to anti-forced labor initiatives.

In 2023, Comcast Cable enhanced its screening mechanisms by incorporating additional analytics tools and other processes to identify risks within the supply chain for modern slavery and human trafficking. Comcast Cable conducts due diligence on its third-party suppliers, including screening for potential sanctions, international trade issues and

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reputational issues. In 2023, Comcast Cable conducted diligence on approximately 1,000 third-party suppliers. If a 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.

As noted in prior statements, among the higher-risk areas of NBCUniversal's business are consumer products licensing which involves third-party factory production, the operations of Universal Destinations & Experiences, 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 Destinations & Experiences division of NBCUniversal 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 of 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 when it opens will fall under the same management and controls as the original park in Orlando.

Universal Destinations & Experiences also recently announced the construction of two new U.S. projects, one in Texas and one in Nevada. Where Universal Destinations & Experiences outsources construction activities to third parties, adherence to health and safety and labor laws are

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conditions of the contract, and all such third parties are subject to appropriate due diligence.

In 2023, NBCUniversal continued its third-party factory auditing program under NBCUniversal's Global Brand Standards policy. NBCUniversal businesses and their agents request approval before third-party factories can produce and distribute NBCUniversal-themed merchandise. NBCUniversal audited and spot-checked 1,695 factories prior to approval for use in 2023, compared to 1,070 in 2022. Most of the audit findings were mitigated by working with the factories to improve standards and conditions prior to authorizing production of themed products. No instances of forced labor were identified in audited or spot-checked factories during 2023.

Sky continued to implement human rights due diligence where the greatest risks were present and completed corrective actions identified through the process. The in-depth risk assessment undertaken for Sky's product supply chain included reviews of country, commodity and labor type, in addition to

suppliers' prior audit history. Sky audited 129 tier 1, 2 and 3 suppliers in scope, across 16 countries, including China, Vietnam, the Philippines, and Taiwan compared to 119 in 2022. Some audits were shadowed by Sky's Group Supply Chain Sustainability and Compliance team which oversees corrective action and continuous improvement plans with suppliers. Directly and indirectly employed workers were included in the scope of the audits, as well as those teams providing on-site services such as cleaning, security and catering. Many audits were completed pre-contract, which increased the opportunity for establishing improvements ahead of production, and informing decisions made by commercial teams.

In 2023 the Sky audit program identified potential indicators related to forced labor, including payment of recruitment fees by workers, excessive working hours, discrimination, and impermissible payroll deductions in tier 2 and 3 of the supply chain. Engagement with suppliers resulted in proactive improvements, including building up internal resources for human rights due diligence, training provided by Sky and the RBA, corrective action plans, and several suppliers obtaining RBA membership. Sky also completed follow up closure audits and verified that improvements

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were made at three factories where forced labor indicators had previously been identified.

Sky made an additional 55 factory visits to new and existing partners in 2023, supporting enhanced dialogue and effectiveness of continuous improvement. Sky also commissioned four third-party worker surveys provided by Labour Solutions, with partners in Poland, Vietnam, the Philippines, and Indonesia, to further support the effectiveness of our due diligence approach. Sky saw improved participation year over year within the surveys, with several positive indicators in areas including benefits and insurance, health and safety, and relationships with other workers. Areas for improvement included accommodations, facilities and workload or stress at work. Based on that feedback and the audit findings, Sky is now engaging with suppliers to identify root causes and oversee areas for improvements.

Sky's due diligence around high-risk minerals in its products continued in 2023, in line with the framework described in the "Organisation for Economic Co-operation and Development Due Diligence Guidance." As

members of the Responsible Minerals Initiative, Sky uses the Conflict Minerals Reporting Template process to develop greater transparency and identify where higher risks may exist within its supply chain. As outlined in Sky's Conflict Minerals Policy Statement, suppliers are expected to annually disclose to Sky, on a confidential basis, updated smelter/refinery information for any tin, tantalum, tungsten or gold (3TG) used in the production of parts, materials, components and products. In 2023, Sky extended its supplier outreach to include the Extended Minerals Reporting Template, which requests disclosure for any cobalt and mica in addition to 3TG.

Sky continues to build capability and due diligence reviews in indirect supply chains for Sky products and services which include branded merchandise, clothing, commissioned productions and construction. In 2023 Sky extended due diligence to renewable energy, technology and outsourced contact centers.

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## OUR INDUSTRY EFFORTS

Comcast seeks to collaborate with industry peers and NGOs to improve and enhance its processes and promote industry-wide improvements. In 2023, Comcast Corporation, through its RBA membership, continued its commitment to supporting continuous improvements in the social, environmental, and ethical responsibility of its supply chains.

NBCUniversal and Sky are both founding members of the UK TV Industry Human Rights Forum. Through the Forum, NBCUniversal and Sky commission research and industry events 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 support the development and piloting of tools, such as procurement checks, to improve working conditions for content production workers. All research and toolkit output from the forum is published and

made freely available for use by others in the industry.

Both Sky and NBCUniversal sit on the Advisory Council of the Centre for Sports Human Rights, a not-for-profit organization headquartered in Geneva, Switzerland, established to embed human rights values into the sports industry, including major sporting events such as football World Cups and Olympics, as well as one-off sporting events. 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.

NBCUniversal renewed its membership in SPLICE, the “Society of Product Licensors Committed to Excellence,” a trade association established to share best practices amongst brand licensors in relevant areas including social responsibility and respecting human rights.

Comcast Corporation recognizes that NGOs and charitable organizations have a key role to play in raising the profile of modern slavery risks and

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helping to support victims. Sky and NBCUniversal became members of the Unseen Business Hub cementing their long-term relationship with an organization that provides critical support services for victims of modern slavery. Sky and NBCUniversal continue to support the UK Modern Slavery Helpline, which is run by the Unseen Business Hub.

This Statement on Modern Slavery and Supply Chain Values has been signed by the undersigned director for and on behalf 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.

*Elizabeth Wideman*

**Elizabeth Wideman**

Director

June 25, 2024