



# 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 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 2022. 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 Annual Modern Slavery Update.

## OUR STRUCTURE, BUSINESSES AND SUPPLY CHAINS

Comcast is a global media and technology company with approximately 186,000 employees worldwide and three primary business units: Comcast Cable, NBCUniversal, and Sky.

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We are principally focused on connectivity, aggregation and streaming 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 Destinations and Experiences (formerly 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 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.

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

As noted in last year’s statement, we advanced our Responsible Procurement program in 2022 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 CSR (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.

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## 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 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 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 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 will not be tolerated in NBCUniversal's operations and

supply chains and reminds employees where they can report concerns.

Comcast Cable also continues to develop a tailored Human Rights and Modern Slavery Policy to enhance its existing policy framework and align with newly launched enhanced diligence processes.

## Training

Central to our enterprise training program is our Code of Conduct, which our employees are required to acknowledge annually and receive training biennially. 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.

As we shared in last year's statement, the enterprise prepared for new U.S. importation legislation linked to anti-forced labor initiatives and updated its diligence efforts and processes during 2022.

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In 2022, individual business units continued 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.

Sky provided human rights due diligence and governance training to those with responsibilities under Sky's Human Rights Program, including the Human Rights Leadership Group as well as functions such as Human Resources. The training provided in-depth guidance on Sky's risk management and implementation of the UN Guiding Principles on Business and Human Rights. Sky joined the Unseen Business Hub and in 2023 will begin rolling out training to wider teams within Sky Group who manage higher risk business relationships.

In 2022, Sky also shared training opportunities, made available through the TV Industry Human Rights Forum, with suppliers, partners and production companies that participated in the forum. Additional training was provided to suppliers and partners in Sky's

construction and electronics manufacturing value chain to support the implementation of Sky's Preventing Labour Exploitation in Construction Programme. Sky also joined the Indirect Spend Alliance, developing tools for risk analysis, supplier engagement and providing training for Sky's Procurement colleagues in indirect spend areas, including logistics, waste, facility services and technology.

## **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 focuses on risks in other areas pertinent to modern slavery, including third-party risk management, anti-bribery and anti-corruption.

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In 2022, Comcast Cable and NBCUniversal continued to focus their assessments on areas including labor exploitation, modern slavery, human rights, international trade controls, and privacy. Comcast Cable also conducted risk assessments designed to examine the processes around onboarding, monitoring, and review of third parties and subcontractors in and outside of the United States. Comcast Cable also deployed expanded due diligence processes that increased the number of suppliers subject to diligence and provides for diligence specifically focused on human rights practices.

Sky's annual human rights and risk assessment process was expanded, with a particular focus on Sky Deutschland in preparation for the German Act on Corporate Due Diligence Obligations in Supply Chains, which came into force on January 1, 2023. Sky Deutschland is further embedding existing human rights due diligence management systems and implementing additional measures to meet the requirements of the legislation. Beginning in 2024, as required, Sky Deutschland will publish an annual report on its website regarding its ongoing risk management activities in accordance with the Act.

In 2022, Sky also launched a new Supplier Compliance Program, building on its existing processes by enhancing human rights and environmental screenings, risk assessment, and risk management with respect to Sky's suppliers. The program is underway for new suppliers, with a phased approach for reviewing existing suppliers.

## **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, 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 policies 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.

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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 good faith allegations or concerns raised through the portal or hotline.

In 2022, Comcast began the process of adopting an Enterprise EU Whistleblower Directive Policy. The policy 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 as the Directive is transcribed into law by the Member Nations.

Employee engagement surveys provide an additional forum for employees to raise issues and express concerns.

## 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 only work with those who are legitimate, 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 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. 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, international trade issues as well as reputational issues. In 2022, Comcast Cable conducted diligence



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on approximately 900 third-party suppliers and will continue to expand its diligence efforts as the Responsible Procurement program advances in 2023.

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 and 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 and 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 will fall under the same management and controls as the original park in Orlando.

Universal Destinations and Experiences also recently announced the construction of two new U.S. projects, one in Texas and one in Nevada. Where Universal Destinations and Experiences outsources construction activities to third parties, adherence to health and safety and labor laws are conditions of the contract, and all such third parties are subject to appropriate due diligence.

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In 2022, 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 approximately 1,070 factories prior to approval for use in 2022, compared to 1,150 in 2021. Most of the audit findings were mitigated by working with the factories to improve standards and conditions prior to authorizing production of themed products. However, in 2022 two instances of forced labor were identified in audited factories and neither were approved for production.

Sky continued to improve its Supply Chain Sustainability Program in 2022. To support the development of the human rights due diligence program in implementing effective actions, a new due diligence tool was piloted to improve the process management for corrective action plans in Sky's product supply chain and provide better statistical analysis. Sky audited 119 tier 1, 2 and 3 suppliers in its product manufacturing supply chain, compared to 100 in 2021.

Excessive overtime, lack of social insurance and health and safety were the issues raised most frequently. Through the RBA auditing program, Sky identified six suppliers with potential indicators related to forced labor. These were related to lack of policies prohibiting forced labor, failure to return all recruitment fees, improper salary deductions used as a disciplinary measure, provision of employment contract terms in conflict with local labor laws, and failure to ensure that all contracts are signed by the employer with copies provided to the workers. Identifying these concerns allows Sky to engage with suppliers, which has resulted in closing of action items and remediation. Where issues were identified in a pre-contract audit, Sky has not sourced from the site until improvements have been verified.

The ethical audits conducted on behalf of Sky in Sky's product supply chain now include service providers to the supplier's site. These audits identified one case where responsible recruitment procedures were not consistently being monitored by Sky's supplier for its third-party services provider. Sky worked with this supplier

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to ensure responsible recruitment standards are regularly monitored and communicated to all workers. Sky is now working to identify suppliers for further engagement to promote responsible recruitment and employment with recruitment providers and service suppliers.

Sky used the Responsible Mineral Initiative's Conflict Minerals Reporting Template to identify suppliers in their electronic products supply chain that use high-risk minerals and have non-conforming smelters. In 2022, Sky engaged with suppliers to inform them and request they work to ensure conformant smelters are sought.

Additionally, Sky has further formalized its human rights governance process. In accordance with the German Act on Corporate Due Diligence Obligations, Sky has established a dedicated Committee within the Human Rights Leadership Group to oversee risk management activities within Sky Deutschland.

## OUR INDUSTRY EFFORTS

Comcast seeks to collaborate with industry peers and NGOs to improve and enhance its processes and promote industry-wide improvements. In 2022, Comcast Corporation became a member of the Responsible Business Alliance (RBA), which is the world's largest industry coalition dedicated to supporting the rights and well-being of workers and worldwide communities affected by global supply chain issues. Comcast Corporation, through its RBA membership, is committed 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

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are now supporting 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 also is a member of 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 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 Unseen.

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## *Embedding a Focus on Labor Rights into The Construction of Sky Studios Elstree*

The construction of Sky Studios Elstree has involved the design and build of twelve sound stages, two production support buildings, four production office buildings, one main administration building and a 900+ space multi-story car park, together with associated external works. Sky has worked closely with the main contractor, BAM, throughout the project to embed a focus on labor rights in the construction process. The cooperation of a client, future tenant and main contractor provided the resources and impetus necessary to explore good practices in-depth, develop a systemic approach to supplier due diligence, and test different types of intervention. The program involved training, supplier engagement, worker engagement, a response protocol, worker surveys and focused audits. Sky also piloted a consultation with on-site supervisors, a specialized investigative approach and worker's rights clinics, all of which provided additional insights and lessons.

To a considerable extent, the project achieved its objectives in systematizing a due diligence approach, piloting new interventions and building capacity through supplier engagement. Sky did not identify any hidden worker exploitation, but did find gaps in due diligence systems in the supply chain and provided support to suppliers to address them. BAM has taken on some of the best practices, such as training for front-line responders, and rolled them out more widely to other projects. A significant number of suppliers reported increased understanding and broader changes to their practices because of their involvement in the project.

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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.

*Tom Reid*

Thomas J. Reid

Director

June 27, 2023