



Believe in Better

**Our Ways of Working**



## Welcome

Our world is moving at high speed, always changing. And it's the same for us here at Sky. But we like change, it keeps us dynamic, exciting and leading the way. We're a big company. We're optimistic and we do inspirational things. We didn't get to be like this through chance, we have some strong beliefs which are important for the success of our business.

Our heart is in entertaining and connecting our customers. We also have an ongoing promise to be continually recognised as being socially and environmentally responsible, to be a good company to work with and, a great place to work. Everyone at Sky can play a part in this; each one of us can bring this to life by the way we work together and the values we share.

We want to create a business we can all be proud of. And to make this happen, we need brilliant people who inspire and deliver change all around them. Within this booklet you'll find the tools you'll need to help you do your bit; to help make better things happen for our Sky customers, our environment and for our workplace.

A handwritten signature in black ink, appearing to read 'Jeremy Darroch'. The signature is stylized and includes a horizontal line underneath.

Jeremy Darroch  
Group Chief Executive

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## How we do things

Whatever you do for Sky, we're all part of the same team. We do things the Sky way and we all have the same principles. That's what makes Sky such an inspiring place.

Sky's success is not just based on what we do but how we do it, to make sure we're a responsible business.

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Sky News glass box

## Doing the right thing

### People power

At the very heart of everything we do is doing the right thing. We act honestly and with integrity. We're responsible, respectful and fair with our customers, our colleagues, our business partners and the wider community. If we're all doing our very best, we'll make sure the creativity keeps flowing to provide our customers with the best experience.

We value and embrace difference. Everyone has a lot to offer and a contribution to make. We welcome people from different backgrounds and cultures to work here and feel valued. We all have the same opportunities to grow and develop, chances to share ideas and have a say.

Through [Sky Forum](#) we empower you to make suggestions about the business. It's a place to have your voice heard and make a difference.



### The best of you

If there's one place you can be your very best, it's here. We nurture and grow our peoples' talent from within. That's why we work with you to develop your skills and help you to become the best version of yourself.

You have lots of resources to draw on including digital learning solutions, coaching and training courses, as well as the chance to experience cross-functional working.

If you're at the top of your game, Sky will be too.

### Work-life balance

Balance is important to get right. Flexible working can play an important part in this. If you'd like to know more about working flexibly, just speak to your line manager.

### Stay safe and healthy

The most important priority is your safety. Whatever part of the business you work in, it's vital that you and your colleagues stay safe. So we'll ask you to take a health and safety learning course every year. And if you ever notice any hazards, have an accident or a 'near miss', please let your line manager know.

Our *Live Well* programme offers a range of services including occupational advice and suggestions on how to stay physically healthy in day-to-day life. And we'll help you eat well too, with a range of healthy options in our canteens.



### Making a difference

We want to be a great company for the communities where we live and work. Volunteering helps our communities and builds our skills and wellbeing. We have a role to play in having a positive impact. That's why we all have two paid days for volunteering each year.

If you'd like to donate to a charity through payroll giving or matched funding, we'll support you. Visit [My Sky Rewards](#) to find out how easy it is to apply.

### Early Careers

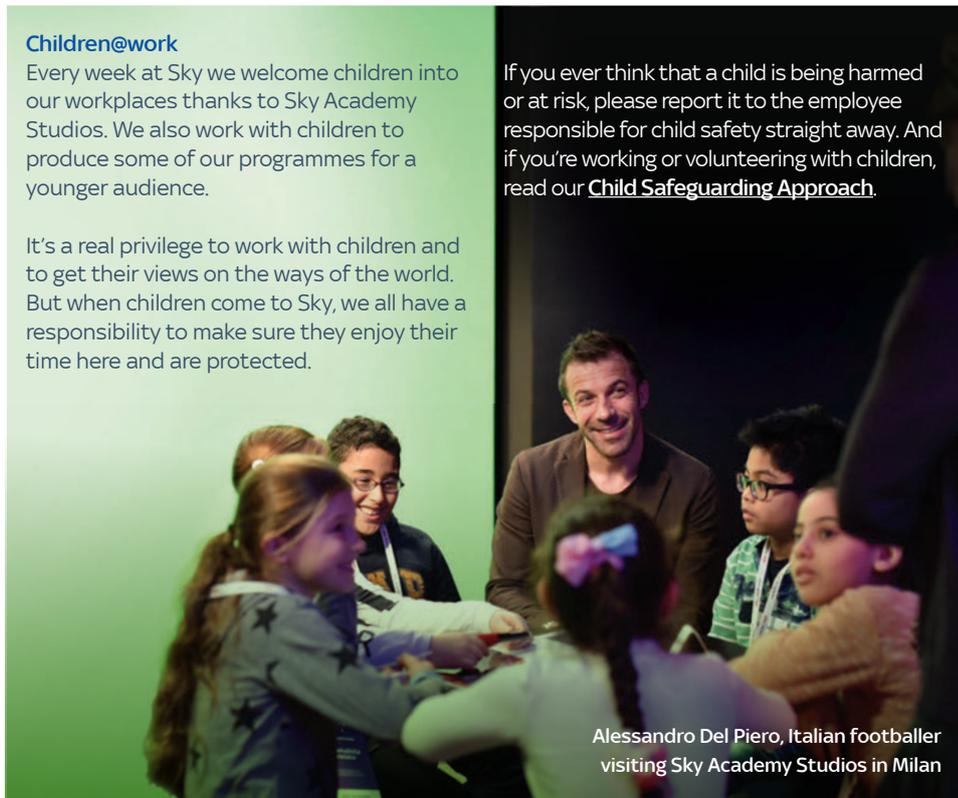
We believe in young people. We provide early career opportunities to young people through work experience, graduate schemes and apprenticeships. We support them to gain experience and encourage them to share their ideas and take on new challenges to get the best start to working life. If you know a young person who would like to take part they can find out more on [our website](#).

### Children@work

Every week at Sky we welcome children into our workplaces thanks to Sky Academy Studios. We also work with children to produce some of our programmes for a younger audience.

It's a real privilege to work with children and to get their views on the ways of the world. But when children come to Sky, we all have a responsibility to make sure they enjoy their time here and are protected.

If you ever think that a child is being harmed or at risk, please report it to the employee responsible for child safety straight away. And if you're working or volunteering with children, read our [Child Safeguarding Approach](#).



Alessandro Del Piero, Italian footballer  
visiting Sky Academy Studios in Milan

### You are Sky

You need to be the best you can be. If you have the chance to represent us by attending an event or speaking to the media, we'll give you all the support you need to make it a success. Check our guidelines and talk to our [Corporate Communications](#) team who will help you get the most out of the event.

### Tweet tweet

Remember everything on social media is public. Be careful when you're using sites like Chatter, Twitter and Facebook. We have a responsibility to uphold Sky's reputation, so use social media with care. And if you're looking after a Sky social media account, take a look at the [Online Compliance @ Sky](#) site.

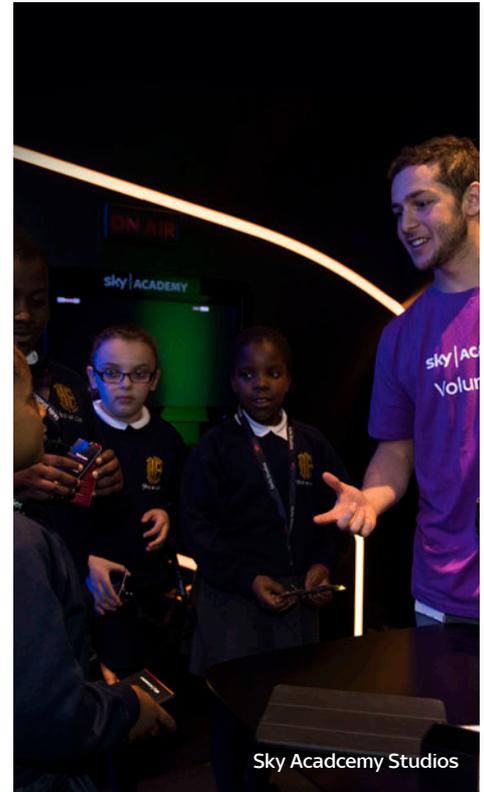
### Protecting our reputation

We've worked hard to build our reputation over the years. But reputations can be lost all too easily. That's why we make sure there's never any conflict of interest that could put our reputation in jeopardy.

### What does conflict of interest look like?

We define an employee as having a conflict of interest when they:

- Own a material interest in any of our suppliers, customers or competitors.
- Are involved in the management or operation of a customer, supplier or competitor of Sky, for example, serving as a director, employee, officer, partner or consultant.
- Take on any outside business activity that detracts from their ability to devote appropriate time and attention to their work at Sky.
- Use corporate assets or their position with Sky for personal gain.
- Act as a broker, finder or intermediary for someone else's benefit in transactions involving Sky or affecting our interests.
- Supervise, review or influence the pay or benefit of any member of their household, or a close relative or of someone they are in a relationship with.
- If in doubt ask!



Sky Academy Studios

### Speak up

If you feel that you, or someone you know, is being treated unfairly, discriminated against or bullied, please speak out. You can report it via [PeoplePlus](#), where everything will remain confidential and anonymous. We'll look into it, sensitively and address the issue you've raised.

### Giving or accepting gifts and hospitality

We don't, under any circumstances, give or accept bribes. To make sure there is never any misunderstanding, we always act with complete transparency. If you're offered a gift or hospitality, please report it. Let your line manager know, as well as Audit Risk Management and Compliance, and fill in the Declaration of Gifts and Hospitality form on [Ariba](#). Why not remind yourself of [our policy](#) too.



Rachel Wyse and Tom White being surprised by Westworld hosts

## Looking out for our customers



Contact centre

We are here to serve our customers. If we don't get that right nothing else works. We'll do this through:

- Excellent customer service.
- Providing clear and honest information.
- Fixing things quickly and easily.
- Protecting our customers information.
- Reassurance that their children are safe when using our products.
- Easy access to our products and services.
- Advertising that adheres to the latest rules and standards.

### Experiences to remember

We want our customers to enjoy Sky and keep coming back to us, so we strive to always be professional, honest and helpful.

If anything ever goes wrong, make sure you check our [Complaints Code](#) to help a customer understand how they can go about making a complaint.

### Keeping information safe

We are always professional, honest and respectful. When you're working at Sky, you may handle personal or sensitive information about customers or employees. Everyone has a responsibility to keep confidential information safe.

To understand how to look after personal data, we have clear [data protection policies](#) and we'll ask you to complete data protection training every year.

If there's a breach in data protection, we'll take strong action to protect our customers, keep their trust and protect our reputation.

### Protecting our younger viewers

Children and young people are an important audience for Sky. We all play our part in making sure Sky is a safe place for everyone to enjoy entertainment, online or on screen.

To know more, please visit [Online Compliance@Sky](mailto:OnlineCompliance@Sky)

### All in

Everyone deserves to be able to enjoy the same Sky experience. That's why we subtitle and audio describe so much of our content. We take great care choosing what to subtitle and audio describe, to reflect the choices of our customers who rely on access services.

If you're working on digital platforms or content, please look at our [digital accessibility guide](#) to make sure our websites and apps are all accessible.

### Seeing the difference with Sky Q

When we launched Sky Q, we worked with consultants from the Royal National Institute of Blind People (RNIB) to create a high contrast version of the user interface. The setting means that people with visual impairment can navigate Sky Q more easily.



Sky Q

### Responsible journalism

We pride ourselves in delivering journalism of the highest standards and our news coverage is always fair, accurate and impartial.

Our [Sky News Editorial Guides](#) help us produce high quality news, maintaining the highest ethical and editorial standards. If you're a Sky journalist, you have a responsibility to understand our guidelines, as well as the [Ofcom Broadcasting Code](#).

### Advertising rules

We follow the Advertising Standards Authority's (ASA) UK Code of Broadcast Advertising, which means that our advertisements must never mislead or cause offence or harm, especially to children or vulnerable people.

All the adverts we show must be approved by Clearcast, an industry body that checks advertisements against the Broadcasting Committee of Advertising Practice (BCAP) code before they are shown.

If someone tells you they are concerned by something they have seen on Sky, ask them to get in touch online at [contactus.sky.com/uk](https://www.contactus.sky.com/uk) or by calling 0333 759 3788.



Sky News glass box

## Working with our suppliers

Our business relies on having strong relationships with a wide range of suppliers, partners and distributors. It's everyone's job to ensure we are a good partner, helping to create productive and fair working relationships.

### Better together

We set and expect our suppliers to keep, high ethical, environmental and social standards, just like we have at Sky. You can find out more in our [Responsible Sourcing Policy](#).

### The art of buying

We use [Ariba](#) to buy most goods and services. If you have to buy on behalf of Sky, visit our [How to Buy](#) site, or read our [How to](#) guides.

We support Sky's suppliers and their partners to ensure they're working to the highest environmental and ethical standards. To meet these standards, use one of Sky's approved suppliers where possible. Also try to place an order with as much notice as possible to ensure suppliers have the time they need to source items responsibly from approved Sky supply chains.

### Look out for others

Sometimes you might be worried that people in our supply chain are being treated unfairly, for instance being taken advantage of by their employer.

If people are working against their will, it's a form of modern slavery - an international crime affecting millions of people around the world, including those in wealthy and developed countries.

You can help make sure there is no slavery in our supply chain, by understanding the [signs of modern slavery](#). If you see anything that makes you worried or suspicious, please refer to [Sky's Whistleblowing Policy](#).

### Our responsible sourcing principles

1. Complying with the law is non-negotiable.
2. Good environmental management is good business.
3. Less is more: cut emissions and waste.
4. Coming to work should be a choice.
5. Work shouldn't harm your health.
6. Workers should be of an appropriate age.
7. Fair pay for sensible hours.
8. Treat everyone fairly and equally.
9. Communicate with transparency and openness.
10. Work with us and the wider supplychain to continuously improve.

## Protecting the environment

At Sky protecting the environment for future generations is really important to us.

Whether that's reducing our carbon emissions or tackling the plastic problem in our oceans - we are committed to protecting the environment. We will leave things better than when we found them which is something all our employees and customers are helping to contribute to.



sky atlantic

A plastic whale

## Sky Ocean Rescue

We're a large company, so we can make a tidal wave of difference. We do inspirational things and use our reach and voice to inspire people to take action to protect our planet.

Sky Ocean Rescue addresses the issues of ocean health, encouraging people to take action in their daily lives and driving change.

Our three commitments are:



Find out more at [skyoceanrescue.com](https://skyoceanrescue.com) and think about how you can play your part.



Our plastic whale visiting Leeds

### Our great buildings

Our buildings are designed to let you work flexibly and virtually when you need to. With technology like Skype, meetings don't have to involve travelling.

### Waste not want not

We're aiming to reduce the waste we send to landfill to zero by 2020. You can play a big part, simply by recycling what you use. So look out for the recycling bins at work – you can recycle food waste, plastics, papers and cans.

### Moving in the right direction

We encourage you to travel on public transport and Sky shuttle buses. If you buy a season ticket for train or bus travel, we can help by providing a loan. If you cycle to work, all our sites have storage facilities and we offer **tax-efficient schemes** to help you buy a bicycle too.

If driving is the only option, there are still ways we can be kinder to the environment. We support car sharing and offer park and ride schemes at a number of our sites.

### Working with our suppliers

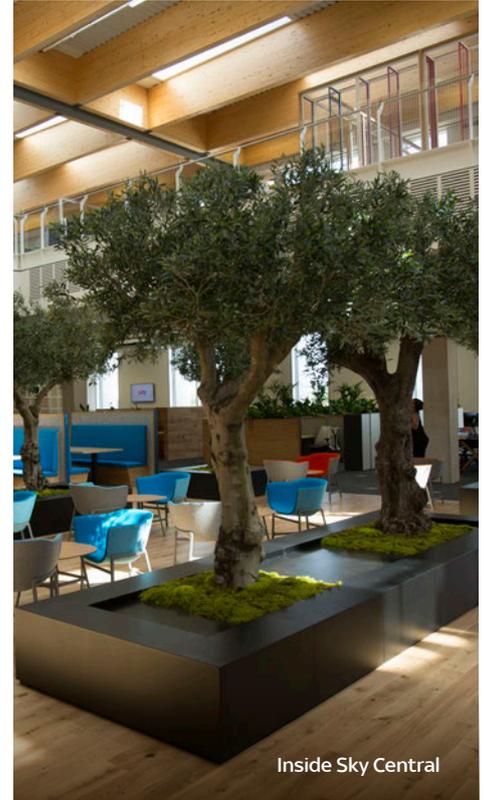
Whenever we purchase products from suppliers, we try to choose environmentally efficient and friendly products. We work closely with our suppliers to influence their choices too. For example, one of our suppliers in China uses renewable energy in its factories thanks to our support.

### Products that make a difference

When we design Sky products, we think about energy use, maintenance and end recycling. We work to use fewer raw materials and more recycled content, helping us reduce transport emissions and packaging. The Sky Q box is 50% smaller than the SkyHD model, reducing the amount of materials used and space transporting it.

We're also working hard to reduce single use plastic in our product packaging and transport.

When customers return Sky products to us, we reuse or recycle it. To find out more, visit [Sky.com/return-your-old-sky-products](https://www.sky.com/return-your-old-sky-products).



Inside Sky Central

## Complying with the law

As a high profile organisation leading the way in news and entertainment, we work with governments and regulators, as well as the media in general. We make sure we're always open and honest with everyone we come into contact with.

### A legal matter

We comply with all laws and regulations that apply to our business.

You should refer any issue as follows:

- For legal issues talk to the [Legal Department](#).
- If the police or Customs and Excise get in touch refer them to our [Group Security Department](#).
- And if the media, regulators or government officials talk to you, please refer them to the [Corporate Communications team](#).

### Always acting fairly

We follow competition and anti-trust laws, making sure that Sky is never involved in any conduct that could damage competition.

We only ever obtain competitive intelligence in a legal and honest way. And we'll never accept, use or encourage the disclosure of information that could breach trust or confidentiality.

### Accurate and honest reporting

All our company records and accounts should be 100% accurate, complete and prompt. So if you're involved in financial statements, reports or public announcements, you have a responsibility to make sure they're true, clear and fair.

Our financial statements should also comply with the latest accounting principles and regulatory requirements. And you should never make artificial, false or inaccurate entries in our accounts and records.

### Insider information

Sky's shares are listed on the London Stock Exchange and we've adopted the UK Listing Authority's Model Code for Dealing in Securities as our standard for share dealing. You must never use insider information to deal in Sky shares yourself, or pass on inside information to anyone outside of Sky.

### What are 'restricted persons'?

Our directors and some senior managers are known as 'restricted persons'. This means that they aren't allowed to deal in Sky securities unless they have clearance from the Company Secretary's office. And at certain 'closed periods' they're not allowed to deal in Sky securities at all. We make sure people impacted know when these periods are.



### **Working with governments and regulators**

At Sky, we share our industry expertise to contribute to discussions with the government and our regulators in a range of public policy issues. For example, making the internet safe for everyone and increasing diversity in broadcasting.

We get involved at a local, national and European level and through a number of trade organisations. We're transparent about what we do and believe and we report our work online at [corporate.sky.com](https://corporate.sky.com).

### **The political and the personal**

You are entitled to your political opinions however you can't make political contributions to political individuals or parties on behalf of Sky. If you're not sure whether something may be seen as a political contribution, talk to the [Company Secretary's office](#).

Please also be careful to never give or offer anything of value to a public official. This could be seen as an attempt to influence a decision, or a facilitation payment, which could result in fines or imprisonment.

## Talk to us

If you have a question or suggestion just ask. If you raise a concern your confidentiality is important to us and we will ensure it is addressed in a safe and protected environment.

### Concerned about your role?

If you think something isn't working well please talk to your line manager or call People Plus on **0333 1001111**.

### Concerned about malpractice or wrongdoing?

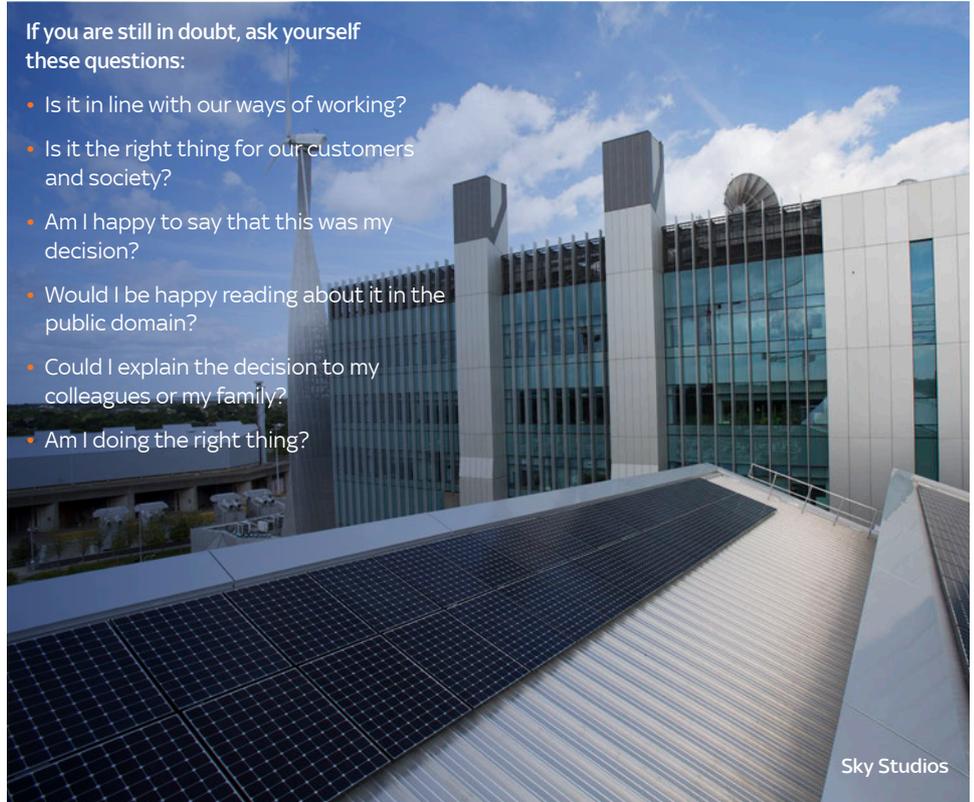
Call our confidential whistleblowing line on 0800 374 199 or read how to report your concerns in our [Whistleblowing Policy](#).

### We'll deal with it

If you raise a concern, our [Whistleblowing Policy](#) ensures your views will be heard without prejudice or harassment. We have a fair and consistent approach to investigating any misconduct you tell us about.

If you are still in doubt, ask yourself these questions:

- Is it in line with our ways of working?
- Is it the right thing for our customers and society?
- Am I happy to say that this was my decision?
- Would I be happy reading about it in the public domain?
- Could I explain the decision to my colleagues or my family?
- Am I doing the right thing?



# Useful resources and contacts

You can find all of our policies on People@Sky [our.intranet.sky/peopleatsky](https://our.intranet.sky/peopleatsky) including:

- Child Safeguarding Approach
- Gifts and hospitality
- Whistleblowing
- Data protection
- Digital online accessibility guide
- Volunteering
- Social media
- Anti-Bribery Corruption
- Anti-Money Laundering

Through [today@sky](mailto:today@sky) you can access:

- Sky Forum: [at.sky/forum](https://at.sky/forum)
- My Sky Rewards: [sky.orbitbenefits.com](https://sky.orbitbenefits.com)
- My Sky Development: [learning.sky.com](https://learning.sky.com)
- Health, Fitness and wellbeing: [our.intranet.sky/SkyHealth-Fitness](https://our.intranet.sky/SkyHealth-Fitness)
- Travel@Sky: [our.intranet.sky/how-to-buy/Travel](https://our.intranet.sky/how-to-buy/Travel)
- How to Buy: [our.intranet.sky/how-to-buy](https://our.intranet.sky/how-to-buy)
- Online Compliance@Sky: [our.intranet.sky/onlinecomplianceatsky](https://our.intranet.sky/onlinecomplianceatsky)

**Internal contacts:**

- Corporate Communications email: [skypress@sky.uk](mailto:skypress@sky.uk)
- PeoplePlus email: [peopleplus@sky](mailto:peopleplus@sky) or call 0333 1001111
- Legal department: [our.intranet.sky/legal-department](https://our.intranet.sky/legal-department)
- Group Security Department: [our.intranet.sky/onlinecomplianceatsky/security/group-security](https://our.intranet.sky/onlinecomplianceatsky/security/group-security)
- Company Secretary's office email: [company.secretariat@sky.uk](mailto:company.secretariat@sky.uk)

**Other online resources:**

- Sky's Early Careers website: [workforsky.com/earlycareers](https://workforsky.com/earlycareers)
- Sky's Complaints Code: [sky.com/help/articles/sky-customer-complaints-code-of-practice](https://sky.com/help/articles/sky-customer-complaints-code-of-practice)
- Sky News Editorial Guidelines: [news.sky.com/docs/sky\\_news\\_editorial\\_guidelines.pdf](https://news.sky.com/docs/sky_news_editorial_guidelines.pdf)
- Ofcom Broadcasting Code: [ofcom.org.uk/\\_data/assets/pdf\\_file/0005/100103/broadcast-code-april-2017.pdf](https://ofcom.org.uk/_data/assets/pdf_file/0005/100103/broadcast-code-april-2017.pdf)
- Sky's Responsible Sourcing Policy: [corporate.sky.com/documents/bigger-picture/policies-2015/responsible-sourcing-policy-july-2015.pdf](https://corporate.sky.com/documents/bigger-picture/policies-2015/responsible-sourcing-policy-july-2015.pdf)
- Signs of modern slavery: [modernslaveryhelpline.org/learn-more/general/spot-the-signs](https://modernslaveryhelpline.org/learn-more/general/spot-the-signs)



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