Code of Conduct for Suppliers and Business Partners

NBCUniversal sky

To Our Valued Suppliers and Business Partners:

Comcast Corporation, including Comcast Cable, NBCUniversal, and Sky (collectively, "we", "us", "our", or "Company"), is committed to operating with integrity and in accordance with applicable laws and regulations. Accordingly, we have created this "Code of Conduct for Suppliers and Business Partners" ("Code"), which sets forth the standards expected of any Supplier or Business Partner doing business with us.

As used in this Code, "Supplier" refers to any firm or individual that provides products, staffing, or services to us, including its personnel, subcontractors, and agents. "Business Partner" refers to any other entity that has a business partnership with us.

By doing business with us or acting on our behalf, our Suppliers and Business Partners ("you") play an important role in our business, and we expect you – including your workers and subcontractors – to act ethically, share in the commitments in this Code, and abide by them and other policies that we may apply to Suppliers and Business Partners as you interact with us or act on our behalf. Specifically, we expect you to operate in compliance with applicable laws and regulations in connection with your provision of products, staffing, or services to or for our Company. By performing work for and on behalf of the Company, you acknowledge that you will conduct yourself in accordance with this Code and its requirements.

Where this Code sets higher standards than what the law requires, we expect Suppliers and Business Partners to adhere to our standards. It supplements, but does not supersede, your contract with us. To the extent there is any inconsistency between this Code and any provision of your contract with us, the contractual provision will control. The Company's Business Units also maintain risk-based policies, procedures and internal controls reasonably designed to support the Company's engagement of Suppliers and Business Partners that adhere to the standards set forth in this Code. This includes, as appropriate, conducting risk-based due diligence and training, as well as monitoring and auditing activities regarding Supplier and Business Partner practices related to the topics covered below.

You must take appropriate steps to ensure that the principles in this Code are communicated to your workers and compliance with the Code is monitored throughout your own supply chain.

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Treat People Fairly and with Respect

We expect you to share our commitment to treating workers with dignity, to employ them on the basis of their ability to do the job—not on the basis of their personal characteristics or beliefs—and treat them fairly and in accordance with applicable laws and regulations regarding labor and employment.

- **No Discrimination or Harassment.** Provide and foster an inclusive and non-discriminatory working environment where all workers are treated with respect and dignity. This includes prohibiting any form of harassment or discrimination based on an individual's race, ethnicity, sex, sexual orientation, gender identity or expression, religion, age, marital status, national origin, ancestry, pregnancy or maternity, medical condition, physical or mental disability, or any trait or status that is protected by law (which may vary from country to country). We will not tolerate any conduct by a Supplier or Business Partner's workers or representatives that is discriminatory, harassing, offensive, abusive, threatening, or retaliatory, or otherwise inconsistent with a respectful workplace.
- **Respect Human Rights.** Conduct business in a manner that respects internationally recognized human rights and enhances the overall quality of life of your workers. These expectations are informed by several international standards, including the United Nations' Universal Declaration of Human Rights and International Labour Organization (ILO) Conventions and the Responsible Business Alliance (RBA).
- **Prevention of Forced Labor and Human Trafficking.** Ensure that all labor is voluntary and that no abusive, exploitative, or illegal conditions exist in your hiring or other human resources practices. Do not support or engage in forced labor, including but not limited to human trafficking. Take steps to recruit responsibly and hold your agents and recruiters to the same standards. Do not impose unreasonable restrictions on your workers' freedom of movement from or within or outside the workplace, including impeding their ability to exit your facilities, and do not withhold workers' government-issued identification or travel documents. Workers should not be charged any fees or costs for being recruited and must not be prevented from or charged for obtaining any sum owed to them.
- **Prevention of Underage Labor.** All workers shall meet the applicable legal minimum age requirements or be at least 16 years of age, whichever is greater. Do not allow young workers (as defined in local law) to undertake night work, overtime, or any hazardous work.
- **Inclusive Supply Chain.** Cultivate an inclusive supply chain process that provides fair opportunities for diverse and small businesses to bid and acquire contracts.
- **Lawful Employment.** Confirm the identity of workers and only employ or engage those who have the legal right to work in the host jurisdiction, reviewing relevant documentation as appropriate.
- **Freedom of Association.** Follow applicable local laws and regulations governing the rights of workers to form and join worker organizations.
- **Wage and Benefits.** Pay your workers in a timely manner and provide compensation (including overtime pay and benefits) required by law and/or contract. Overtime should be paid at or above the minimum wage or regular hourly pay. We expect you to abide by legal limits on the number of working hours and any applicable international

standards and prohibit the use of forced overtime or unfair deductions from pay.

- **Health and Safety.** Implement appropriate procedures, controls, and safeguards to provide a safe, secure, and healthy working environment to your workers and subcontractors, as well as the members of the public in communities where you operate. Ensure that you are meeting applicable legal requirements and best practices and that your workers are provided with relevant training and are consulted as appropriate on health and safety procedures.
- **Embrace Accessibility.** Comcast is committed to disability inclusion. We expect you to share our commitment to meeting applicable accessibility legal requirements and to related technology standards and best practices.

Conduct Your Business Lawfully and with Integrity

We expect you to carry out your business honestly and ethically and operate in full compliance with applicable laws and regulations in the countries and jurisdictions in which you operate.

- **Compliance with Laws.** Comply with applicable laws and regulations within the jurisdictions where you operate, including antitrust or competition laws, laws relating to working with governments, and financial crime laws (e.g., money laundering, fraud, and tax evasion laws).
- **Anti-Bribery / Anti-Corruption Laws.** Prohibit all forms of bribery and corruption by you or anyone acting on your behalf and abide by applicable anti-corruption laws and regulations. Do not seek to influence anyone, directly or indirectly (through a third party), through bribes or kickbacks or any other improper or unethical means, or in a manner that could compromise our Company's reputation and values. All gifts and business entertainment involving our Company must be: offered or accepted with a valid business purpose; prudent and reasonable by local and industry standards; proper in appearance and without risk of embarrassment or harm to our reputation; and in compliance with the law. Never provide, on our behalf, any gift or business entertainment to any government official regardless of the amount, or make contributions to any political party, official, or candidate in connection with work that you do for us, unless we provide advance written approval.

We expect you to carry out your business honestly and ethically, and operate in full compliance with applicable laws and regulations in the countries and jurisdictions in which you operate.

- **Conflicts of Interest.** Avoid any situation that may involve a conflict of interest. Do not use our information for a personal benefit or to promote a competing business or activity. Disclose to us any actual, potential, or perceived conflicts of interest with the work you do for us resulting from personal or business relationships with us and our employees, customers, Suppliers and Business Partners, or our competitors.
- **Business Records.** Maintain books and records that accurately and completely reflect all transactions related to your business with us. Never make any entry in your books and records or alter, conceal, or destroy any document to misrepresent any fact, circumstance, or transaction. We expect you to ensure you have appropriate authorization for each order or requisition and maintain appropriate supporting documentation.
- **Insider Trading.** Do not buy or sell securities when in possession of material, non-public information, and do not share such information with others for any improper purpose.
- **International Trade Control Laws.** Comply with laws, treaties, and regulations in connection with international trade, including export and import regulations, anti-boycott laws, and economic sanctions.

Protect and Respect Privacy, Information, and Property

We expect you to safeguard and only make proper use of information or assets that we share with you and abide by all information protection and privacy laws that apply to your relationship with us.

- **Respect Privacy.** Share our commitment to protect and respect the privacy rights of our employees, customers, Suppliers, and Business Partners, and handle their information with care. We are subject to many laws and regulations that govern the collection and use of personal information. If we share personal or proprietary information with you about us or our customers or other third parties, or allow you to access it, you must handle and use it in compliance with applicable privacy laws and the terms of your contract with us. You must also ensure that only authorized personnel are allowed to access our information, and you must not disclose our information to any third party without our authorization, unless required by law. You must immediately notify your primary contact at the Company if any information we provided or have given you access to has been, or is suspected to have been, lost, stolen, or inappropriately accessed, used, or disclosed.
- **Protect Our Intellectual Property and Other Assets.** Safeguard our intellectual property (e.g., our brands, trademarks, know-how, inventions, patents, content and other copyrighted materials, trade secrets, strategies, computer programs, and media properties, including websites and apps) from unauthorized access, theft, waste, cyber-related attack, misuse, unauthorized distribution, or other type of loss. Technology assets, email systems, and information assets, and customer relationships, are the Company's property and should be used for Company-related business purposes only.
- **Maintain Secure Systems.** Implement and maintain appropriate physical, technical, and organizational measures to ensure the security, confidentiality, integrity, and availability, of your systems, processes, and services, and securely maintain the data you receive from or access from us or hold on our behalf.

- **Business Continuity.** Assess the risk of potential emergencies and other disaster events and implement appropriate plans and response procedures that would minimize an event's impact on your business, including service assurance and recovery plans for products or services that you provide to us, as required by us.

Respect the Environment

We believe in protecting the environment where we live and work so that we have a sustainable planet now and in the future. That's why we at Comcast have made our own carbon commitments and, to meet our goals, are focused on sourcing renewable and clean energy, improving energy efficiency, and measuring and reporting emissions.

We similarly expect our Suppliers and Business Partners to operate in an environmentally responsible and efficient manner and comply with applicable environmental laws and regulations and stay informed of and mitigate environmental risks. We ask our Suppliers and Business Partners to support each of our relevant initiatives and provide relevant reporting on progress, if requested.

- **Sustainable Business Practices.** At a minimum, conduct your operations in a manner that makes reasonable efforts to meet industry best practices and standards to minimize the impact on the environment. Mitigate and manage your impact on natural resources, emissions and discharges of pollutants, and other environmental effects that may arise from your business operations, including your work on new or modified products for us.
- **Responsible Sourcing of Materials.** Source product materials responsibly, develop more efficient and sustainable packaging for those products, and minimize or eliminate the use of hazardous substances in products provisioned to us – and if your product does contain hazardous materials or conflict minerals, you must adhere to applicable laws and regulations, including regarding labeling. Upon request, you must also support any effort by us to identify the type, origin, and chain-of-custody of materials used in the manufacture of products.
- **Environmental Permits and Reporting.** Obtain, keep current, and comply with all required environmental permitting rules and reporting requirements applicable to your operations.

Ask Questions and Report Concerns

If you have a question or concern about compliance with any provision in this Code, we encourage you to work with your primary contact at the Company to get the answers you need to comply.

If you have a concern about potential illegal or unethical conduct in connection with your relationship with us, please report it to your contact or visit **www.ComcastNBCUniversalListens.com** or **www.ComcastSkyListens.com**.

Concerns related to accounting, internal accounting controls, or auditing matters may also be sent to **Audit_Committee_Chair@comcast.com** and will be handled in accordance with procedures established by the Audit Committee of the Comcast Corporation Board of Directors.