

COMCAST CORPORATION

CODE OF CONDUCT

.....
FACING ETHICAL AND COMPLIANCE
ISSUES WITH INTEGRITY
.....

UPDATED: JUNE 2018

DO what's
RIGHT


COMCAST

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STATEMENT OF INTEGRITY

Having integrity, and operating with integrity, is the most important thing in life and in business. When my father, Ralph, founded Comcast in 1963, he knew that the path to success was built on creating an entrepreneurial culture that valued integrity and respect, above all else.

More than 50 years later, those values are stronger than ever.

Comcast NBCUniversal is a special company. We have a talented and diverse team that cares deeply about the work we do, our customers and viewers, and each other. Across our businesses, we have the unique opportunity—every day—to connect millions of people to the moments and experiences that matter most to them. It is a responsibility we take seriously, and one that requires honesty and heart.

That is why our Code of Conduct is so important. It is the common framework for what we stand for and how we operate. I am personally asking you to commit to following this Code and its principles as a guide for how you do your job and represent our great company. It is as simple as doing the right thing and always treating people the right way.

I am constantly inspired by the pride and enthusiasm of our employees. Thank you for your commitment to Comcast NBCUniversal ... and to upholding the integrity of this wonderful organization.



Brian L. Roberts
Chairman and Chief Executive Officer



RESOURCES FOR EMPLOYEES

We want you to ask questions, raise concerns and speak up. That's why we created Comcast NBCUniversal Listens, which offers several channels to do so. Use the option that is most comfortable for you.



RESOURCES WITHIN YOUR BUSINESS UNIT

No matter the question or concern—whether it involves a workplace issue or suspected illegal or unethical conduct—we want to hear from you. If you have something to say, you may contact any of these resources.

- **Supervisor** – Your supervisor is usually in the best position to resolve your concern quickly. If you're not comfortable raising a concern with your supervisor, you may also contact another local leader.
- **Human Resources** – You may contact your business unit's Human Resources representative.
- **Law Department** – The law department within your business unit can assist you, especially with questions concerning applicable laws and policies.

ADDITIONAL RESOURCES

Comcast NBCUniversal Listens also offers additional resources outside of your business unit for reporting concerns about illegal or unethical conduct:

- **Helpline** – Call 1-877-40-LISTENS (1-877-405-4783) from the United States or click [here](#) to find a toll-free number for other locations.
- **Web Portal** – Visit www.ComcastNBCUniversalListens.com
- **Comcast Cable Resources** – If you are an employee of Comcast Cable, you may also contact a Comcast NBCUniversal Listens representative from [this list](#).
- **NBCUniversal Resources** – If you are an employee of NBCUniversal, you may also contact an NBCUniversal Ombudsperson from [this list](#).

In the United States, and as allowed by law in certain other countries, you may remain anonymous when using the Helpline or Web Portal.

COMCAST CORPORATION AUDIT COMMITTEE RESOURCE

If you have a concern related to accounting, internal accounting controls or auditing matters, you may send an email to:

Audit_Committee_Chair@comcast.com.

Correspondence received by the Audit Committee Chair email account is handled in accordance with procedures established by the Audit Committee.



For more information on the resources described on this page, please visit the Integrity section of your business unit's intranet or www.ComcastNBCUniversalListens.com.

WHAT TO KNOW ABOUT OUR CODE

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PURPOSE

Our Code of Conduct represents our business philosophy and values, and defines how we as a company conduct ourselves around the world. We are committed to operating ethically and honestly and to leading with integrity in all of our business activities. Our Code of Conduct provides principles of business conduct for all of our employees, officers and directors to live up to in order to achieve our ethical standards and commitment to integrity.

PRINCIPLES OF BUSINESS CONDUCT

The foundation of the Code consists of the following important principles of business conduct, which are the key ingredients in establishing and maintaining trust:

- Comply with all applicable laws, regulations, policies and contracts governing our businesses.
- Be honest, fair and trustworthy in all your business activities and relationships.
- Treat one another fairly and foster a safe, diverse and environmentally responsible workplace.
- Protect our assets and information and the assets and information entrusted to us by others.
- Avoid conflicts of interest, and the appearance of such conflicts, between work and personal affairs.
- Compete responsibly in the marketplace.
- Ask questions, raise concerns and speak up. Promptly report any concern you have about compliance with law, Company policy or this Code.
- Through leadership at all levels, create and sustain a culture where ethical conduct is recognized, valued and practiced by all employees.



ETHICAL DECISION-MAKING

WHAT TO DO

In today's rapidly changing workplace, you may encounter unfamiliar situations that present ethical dilemmas. In these circumstances, the right thing to do is not always clear. For this reason, you should become familiar with the contents of the Code. The Code contains a broad overview of key policy areas and examples within each area. It is not all-inclusive. Situations will arise that are not covered here. For those situations, ask yourself these questions:

- Does it potentially violate any applicable law, regulation, policy or contract?
- Does it *feel* right?
- Should I check with my supervisor or another local leader?
- How would it look if it was covered in the news?
- Would I feel comfortable explaining it to my family?
- Could it *appear* improper?

WHAT TO WATCH OUT FOR

Sometimes, it is difficult even to recognize an ethical problem. When in doubt, ask your supervisor, a Human Resources representative or a Company lawyer. Don't disregard a potential issue because you think:

- It's none of my business.
- The Company wants me to do this.
- Everyone does it.
- No one will ever know.

If you find yourself thinking these thoughts, ask yourself the questions listed above to help guide your actions, or contact any of the available employee [resources](#).



APPLICABILITY

The Code applies to all employees, officers and directors of Comcast and its subsidiaries, all of whom are required to periodically acknowledge that they have received and are in compliance with the Code, and that neither the Code nor any of its provisions constitutes an express or implied contract of employment or guarantee of employment for any specific period of time. Use of the term “Company” refers to all of these entities and their respective business units. Use of the term “employment” refers to “service” where applicable for directors of Comcast Corporation. Nothing in the Code limits employees from exercising any right provided by law.

INTERPRETATION, APPROVALS AND WAIVERS

INTERPRETATION

We believe that consistent application of the Code is essential. For help interpreting and applying the Code or any applicable law, regulation, policy or contract to a given situation, you may contact any of the [resources](#) within your business unit, including your supervisor.

APPROVALS

In some sections of the Code, you must obtain approval from a supervisor, “[Senior Attorney](#)” and/or “[Authorized Approver](#)” before engaging in a particular activity. Senior Attorneys include certain senior lawyers from your business unit. Authorized Approvers include Senior Attorneys or other senior leaders from your business unit who have been designated authority pursuant to the Conflicts of Interest policy or the Gifts and Business Entertainment with Commercial Business Partners policy. Always follow the Code’s instructions regarding who to contact if you need to seek an approval. Only authorized employees, as specified in the Code, may grant approvals under the Code. A list of Senior Attorneys and Authorized Approvers can be found [here](#). This information can also be found in the Integrity section of your business unit’s intranet.

WAIVERS

In rare circumstances, an employee may need to seek a waiver under the Code to engage in a particular activity. If a supervisor is asked by an employee to grant a waiver, the supervisor must escalate the matter to a [Senior Attorney](#). Waivers may only be granted by the Comcast Corporation General Counsel, or by the General Counsel of the requesting employee’s business unit. Any waiver of the Code for any Comcast Corporation executive officer or director may only be granted by the Comcast Corporation Board of Directors and will be disclosed to the public as required by law.

WHICH LAW APPLIES

The references in Company policies to the laws of the United States and the other countries where we do business reflect the reality that a global company is regulated by many different laws at the same time.

The Company conducts its business globally. Our employees are citizens of many different countries. As a result, our operations are subject to the laws of many countries, provinces, states and municipalities, and multi-jurisdictional organizations such as the European Union. An important challenge for all of us is to understand how these laws may apply to our operations.

Comcast Corporation is a corporation organized in the United States. The laws of the United States generally extend to all operations of Comcast and its subsidiaries throughout the world, as well as to the business activities of employees wherever they live and work. Other countries may also apply their own laws outside of their borders to their own citizens and to corporations that are organized under their laws, such as company subsidiaries.

The references in Company policies to the laws of the United States and the other countries where we do business reflect the reality that a global company is regulated by many different laws at the same time. In some instances, there may be a conflict between the applicable laws of two or more countries. When you encounter such a conflict, it is especially important to contact a Company lawyer to understand how to resolve that conflict properly.

For employees working, or actions being taken, outside of the United States, references to U.S. currency in the Code mean the applicable foreign currency equivalent, and references to GAAP mean the applicable foreign equivalent to U.S. generally accepted accounting principles.



PENALTIES FOR VIOLATION

Employees, officers and directors who violate the Code or applicable laws, regulations, policies or contracts are subject to disciplinary action up to and including termination of employment or service. Misconduct that may result in discipline includes:

- Directly or indirectly violating the Code or Company policy.
- Directing or assisting others to violate the Code or Company policy.
- Failure to promptly raise a known or suspected violation of the Code or Company policy.
- Failure to cooperate in Company investigations of alleged Code or policy violations.
- Retaliation against another employee for reporting a potential concern about illegal or unethical conduct or assisting in an investigation.
- Failure to supervise, to the extent the circumstances of a violation reflect a supervisor's disregard for the Code.

BUSINESS UNIT POLICIES AND PROCEDURES

Your business unit may issue its own policies and procedures relating to appropriate business conduct consistent with the Code. In some cases, those policies and procedures may impose additional or more stringent requirements. You must follow those policies and procedures in addition to those described in the Code.

INTEGRITY WEBSITES

For more information on many of the topics in the Code, as well as policies that may be applicable to your role in the Company, please visit the Integrity section of your business unit's intranet.

WHAT EMPLOYEES MUST DO

COMPLY WITH THE CODE

- Personally commit to following the Code.
- Periodically certify that you have read, understood and complied with the Code.
- Disclose circumstances that require approval under the Code as outlined in each policy.

RAISE YOUR CONCERNS

- Promptly raise any concern about actual or suspected illegal or unethical conduct using any of the available channels listed under [Resources for Employees](#).
- Cooperate fully and honestly in Company investigations.
- Notify a Company lawyer or Human Resources representative immediately if you have notice of or believe it is reasonably foreseeable that the Company will be the subject of an external investigation, litigation matter or other legal or governmental proceeding.
- Nothing in this or any other Company policy limits your ability to communicate with or provide information to any governmental agency or commission, including the Securities and Exchange Commission, regarding possible legal violations, without disclosure to the Company, as protected under whistleblower laws. The Company will not retaliate against you for any of these activities.

SATISFY YOUR COMPLIANCE OBLIGATIONS

- Understand the laws, regulations, policies and contracts relevant to your job.
- Promptly complete required trainings assigned to you.
- Periodically visit the Integrity section of your business unit's intranet for other important tools and resources, including Company policies and information on how to raise a concern.

WHAT SUPERVISORS MUST DO

In addition to their responsibilities as employees, supervisors must also:

SET THE RIGHT EXAMPLE

- Never cut ethical corners and lead with integrity through your own words and actions—every day.
- Demonstrate that business needs and results are never more important than ethical conduct and compliance with Company policies.
- Support the Company's compliance program, trainings and initiatives and encourage your employees to do the same.
- Allot adequate time and resources to your employees so they can complete their compliance obligations, including trainings.

CREATE AN OPEN REPORTING ENVIRONMENT

- Foster an environment where employees feel safe and comfortable asking a question or raising a concern.
- Make yourself available to employees and allot appropriate time to listen to and discuss their concerns.
- Ask for additional information in a respectful and reassuring manner.
- Remind employees that we strictly prohibit retaliation for any report made in good faith.
- Thank employees for bringing issues to your attention.

KNOW HOW TO RESPOND TO A CONCERN

- For a workplace issue, such as a day-to-day problem with a co-worker or question about Company benefits, take immediate action to resolve the issue or contact your supervisor or a Human Resources representative for assistance so that you may provide a timely response to the employee.
- For an integrity issue, such as an allegation of suspected illegal or unethical conduct, immediately report it to any Human Resources representative or the Comcast NBCUniversal Listens Helpline or [Web Portal](#), or use another employee [resource](#) to speak up.





- If an employee asks you to grant a Code waiver, escalate the matter to a [Senior Attorney](#).
- If an employee asks you to interpret or apply the Code or any applicable law, regulation, policy or contract to a given situation, and you're unsure how to respond, contact a Company lawyer for assistance.
- Never investigate an integrity issue yourself.
- Never hire an outside investigator.
- Never engage in any form of retaliation and do not allow retaliation by others.

WHAT HAPPENS WHEN CONCERNS ARE RAISED

CONCERNS ABOUT ILLEGAL OR UNETHICAL CONDUCT WILL BE INVESTIGATED

- A trained investigator will be assigned to review any integrity concern.
- The investigator will determine the facts through interviews, review of documents or other appropriate means.
- If wrongdoing is confirmed, appropriate discipline and/or corrective action will be taken regardless of the position of individuals involved.

CONFIDENTIALITY IS RESPECTED

The identity of the employee (if provided) and the information provided will be shared only to the extent necessary for purposes of investigating or resolving the concern.

RETALIATION VIOLATES COMPANY POLICY

Our policy strictly prohibits retaliation against any employee, officer or director who in good faith raises a concern or participates in good faith in the handling or investigation of a concern regarding an actual or suspected violation of the Code or policies, or applicable laws, regulations or contracts (even if the concern is eventually unsubstantiated). No employee, officer or director should be discharged, demoted, suspended, threatened, harassed, intimidated, coerced or retaliated against in any other manner as a result of his or her raising in good faith or assisting in good faith in the handling or investigation of a complaint. Note, however, that an allegation of retaliation does not exempt an employee from normal standards of performance and conduct.

If you feel that you have been retaliated against, speak up. Retaliation for raising an integrity concern in good faith is prohibited by the Code and could lead to disciplinary action up to and including termination of employment. For more information on this subject, you should refer to the Anti-Retaliation policy in your business unit's Employee Handbook.

If you feel that you have been retaliated against, speak up.



Kung Fu Panda

CODE POLICIES

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OUR COMMITMENT TO EACH OTHER

Our Company is only as strong as our workforce. That means that we can only succeed by investing in our people and ensuring we have a fair, inclusive and diverse workplace. We commit to maintaining a work environment of mutual trust and respect where all employees are recruited, developed and advanced on the basis of their qualifications, talents and achievements. We commit to lessening our impact on the environment and providing a safe and healthy workplace where no one is subject to unnecessary risk. We commit to handling personal data of our employees, customers and business partners responsibly and acting in compliance with applicable privacy laws worldwide.

- [Fair Employment Practices](#)
- [Environmental, Health and Safety](#)
- [Privacy](#)

FAIR EMPLOYMENT PRACTICES

Fair employment practices are an essential part of our business and help contribute to a culture of respect. That is why we are committed to complying with all applicable labor and employment laws wherever we operate, including laws pertaining to freedom of association, privacy, collective bargaining, immigration, wages and hours, as well as laws prohibiting employment discrimination, trafficking in persons and forced, compulsory and child labor. It is our collective responsibility to create a work environment in which everyone is treated with respect and dignity.

WHAT TO KNOW

- We prohibit unlawful discrimination and harassment.
- We promote equal employment opportunities in compliance with applicable laws.
- We prohibit retaliation against any employee who speaks up in good faith, or who participates in good faith in the handling or investigation of a complaint or concern.

WHAT TO DO

- Base employment decisions on job qualifications and merit, such as education, experience, skills and other job-related criteria.
- Make all employment decisions without considering an individual's race, color, religion, creed, gender, gender identity or expression, age, national origin or ancestry, citizenship, disability, sexual orientation, marital status, pregnancy, veteran status, membership in the uniformed services, genetic information or any other basis protected by applicable law ("protected characteristics").
- Never engage in harassing, offensive, disrespectful or retaliatory conduct.
- Promptly raise any concern about an actual or suspected violation of this policy to your supervisor or Human Resources representative, or use another employee [resource](#) to speak up.
- Contact a Company lawyer if you encounter a conflict between the requirements of this policy and a local law, custom or practice.

WHAT TO WATCH OUT FOR

- Allowing harassment that could create a hostile work environment by, for example: (i) telling jokes or displaying materials that ridicule or offend members of a particular gender, race or ethnic group; (ii) displaying sexually suggestive materials in the workplace or on Company computers or mobile devices; or (iii) pursuing a romantic relationship with a co-worker who has indicated that he or she is not interested.
- Violating a labor law (e.g., hiring a child under the legal minimum age without required permits).
- Unequal treatment of others based on a protected characteristic.



ADDITIONAL RESOURCES IN THE INTEGRITY SECTION OF YOUR BUSINESS UNIT'S INTRANET

- [Frequently Asked Questions](#)
- Anti-retaliation policy in your business unit's Employee Handbook
- Equal employment opportunity policy in your business unit's Employee Handbook
- Harassment policy in your business unit's Employee Handbook



Talk with your supervisor or visit
www.ComcastNBCUniversalListens.com
to learn more about how
to raise a concern.

ENVIRONMENTAL, HEALTH AND SAFETY

We are committed to protecting the environment, as well as the health and safety of employees. Together, we strive to provide a safe and healthy work environment and to avoid adverse impact and injury to the environment, as well as adverse environmental, health and safety impacts to the communities in which we conduct business.

WHAT TO KNOW

- We comply with all environmental, health and safety (“EHS”) laws and regulations applicable to our operations.
- We promote environmentally responsible business practices.
- We develop, and expect every employee to follow, safe work procedures.

WHAT TO DO

- Conduct your job safely and consistently with applicable EHS policies and standards, including avoiding unsafe activities and conditions such as:
 - » Failing to use prescribed safety equipment or observe safety related signs.
 - » Mishandling chemicals.
 - » Distracted or reckless driving, failing to wear seat belts or follow Company driving policies.
 - » Working in high places without fall protection.
 - » Working beneath heavy, suspended loads or improperly using cranes.
 - » Disabling safety controls or guarding on equipment and machinery.
 - » Working on electrical or powered equipment without following safety procedures.
 - » Exposed or unsafe wiring.
 - » Blocked fire or emergency exits.
 - » Potential exposure to serious infectious diseases.



- Assess EHS impact and issues before starting a new activity, project or completing a transaction involving real estate.
- Understand and follow Company policies for managing, shipping, transporting, importing/exporting, recycling or disposing of regulated materials and chemicals.
- Identify methods to reduce any environmental impact associated with your work activity.
- Promptly raise to your supervisor or EHS lead any concerns of EHS conditions or activities that you believe to be unsafe, or use another employee [resource](#) to speak up.
- Promptly report to your supervisor or EHS lead any personal injury or property damage.

WHAT TO WATCH OUT FOR

- Unsafe EHS activities or practices.
- A delayed response to any EHS concern that you raised.
- Any risks and liabilities associated with new acquisitions, site divestitures or exits, activities or projects.



Jurassic World



ADDITIONAL RESOURCES IN THE INTEGRITY SECTION OF YOUR BUSINESS UNIT'S INTRANET

- [Frequently Asked Questions](#)
- Drug and alcohol policy in your business unit's Employee Handbook
- Safety policy in your business unit's Employee Handbook



Talk with your supervisor or visit
www.ComcastNBCUniversalListens.com
to learn more about how
to raise a concern.

PRIVACY

We are committed to protecting and respecting the privacy rights of our employees, customers and business partners, including suppliers and contractors. Each employee must know and follow our policies for the responsible use of personal information.

WHAT TO KNOW

- In the United States, many laws regulate customer and employee “personal data” (e.g., name, home and office contact information and medical and other data), and a number of countries more stringently regulate the collection and use of personal data.
- Many countries regulate the personal data of employees and other personnel in business-to-business transactions. A few countries even regulate information about corporations.
- We are committed to handling personal data responsibly and in compliance with applicable privacy laws worldwide.
- Every employee is responsible for safeguarding personal data within the Company’s control, and must be familiar with all policies and security guidelines of the employee’s business unit for the protection of this information.

WHAT TO DO

- Ask about and comply with all of the following, including applicable: (i) laws and regulations of locations from which personal data is collected and in which it is processed or used; (ii) internal and customer-facing privacy policies of the Company; and (iii) contractual obligations.
- Be aware of personal data that is subject to specific laws, such as customer financial information, cable subscriber personally identifiable information, customer proprietary network information (“CPNI”), health data and children’s information, and contact a Company lawyer with any questions.
- Collect, process and use only the personal data you need for legitimate business purposes.
- Retain personal data in accordance with your business unit’s document retention guidelines and ensure it is disposed of securely.



- Use “anonymous” data (names and other personal information removed and not identifiable) or “aggregated” data (summarized so as not to be identifiable to an individual) instead of personal data where possible.
- Limit access to personal data to individuals who need it for a legitimate business purpose, and, if third parties are involved, carry out a third party risk assessment as appropriate and ensure that there is a written agreement in place that has been reviewed by a Company lawyer.
- Use care to prevent accidental loss or destruction of personal data.
- If you learn that personal data has been used in violation of this policy, or if you learn that the security of any system, device or document containing personal data has been compromised, immediately notify your supervisor and a Company lawyer.

WHAT TO WATCH OUT FOR

- Inadequate access or security controls for personal data.
- Sharing of personal data with third parties, such as suppliers or contractors, who lack appropriate security safeguards, such as restrictions on information use or a written non-disclosure agreement.
- Transfers of personal data between countries without considering applicable legal requirements. If you have collected personal data in a country regulated by a “data protection” law (such as most countries in Europe), contact a Company lawyer.
- Contact a Company lawyer about any new business initiative that may capture or use personal data.



ADDITIONAL RESOURCES IN THE INTEGRITY SECTION OF YOUR BUSINESS UNIT'S INTRANET

- [Frequently Asked Questions](#)
- Confidentiality policy in your business unit's Employee Handbook

OTHER APPLICABLE CODE POLICIES

- [Business Relationships](#)



Talk with your supervisor or visit
www.ComcastNBCUniversalListens.com
to learn more about how
to raise a concern.



OUR COMMITMENT TO OUR COMPANY

We must keep in mind our obligation of loyalty and ethical duty to the Company. We are entrusted with Company assets, both tangible and intangible, including intellectual property, confidential information, time, funds and equipment. We are each responsible for using Company assets only for legitimate business purposes and for protecting them from damage, loss, theft or misuse. Below are several areas that focus on this commitment to the Company and the conduct expected from each of us.

- [Intellectual Property](#)
- [Security and Emergency Preparedness](#)
- [Conflicts of Interest](#)



INTELLECTUAL PROPERTY

Intellectual property (“IP”) is among our most valuable assets. Protecting, maintaining and defending our rights, and respecting the IP rights of others, is critical to the success of our Company. Each employee must be aware of and follow our policies regarding the responsible use of IP and content protection.

WHAT TO KNOW

- IP often refers to information protected by the Company’s copyrights, trademarks, trade names, patents and trade secrets. It can also include many other things such as our brands, logos, package designs, marketing strategies, motion pictures, television shows, website content, digital and mobile applications, inventions and other confidential business ideas and information.
- We comply with the laws and regulations that govern protection of our IP, as well as the IP of others.
- Every employee is responsible for safeguarding our IP and respecting the valid IP rights of others.

WHAT TO DO

- Follow all IP laws.
- Understand and follow your business unit’s applicable policies and guidelines regarding:
 - » The handling and security of IP and confidential information.
 - » The use of Company trademarks and trade names.
 - » The requirements for handling unsolicited ideas from third parties and unsolicited employee submissions.
- Be alert to business practices that may result in the unauthorized distribution or use of Company IP, and promptly contact a Company lawyer with any concerns.
- Take care in everyday matters by not sharing your ID badge, password or other access information, and securing all physical and electronic proprietary content when not in use.
- Use caution when discussing Company business in common areas and public places, such as elevators, trains, airplanes and vehicles with hired drivers.



- Understand your responsibilities to the Company regarding creative works, ideas, inventions and innovations that you develop that relate to the Company's business.
- Comply with your business unit's IP guidelines or contact a Company lawyer if you have any questions about the development, use, exploitation or protection of IP, including when:
 - » Using the IP of others.
 - » Producing or distributing content.
 - » Launching a new service or product.
 - » Introducing (or providing information about) a potentially patentable new product or service to a third party.
 - » Communicating about the scope or validity of the Company's IP (including any belief that someone may be infringing our IP) or taking action against a suspected infringer.
 - » Hiring a new employee, especially a person who previously worked for a competitor.
 - » Accepting confidential or proprietary information from a third party.

WHAT TO WATCH OUT FOR

- Failing to have proper approval and a written agreement in place before you:
 - » Distribute, discuss or otherwise disclose non-public IP or other confidential or proprietary information about our business to a third party.
 - » Hire or engage an outside company or person to develop IP.
- Unauthorized copying or use of copyrighted works of others (including unauthorized downloading or distribution of newspaper and magazine articles, website articles, computer software, music, movies, pictures and graphics).
- Receiving from anyone, or communicating to others within the Company, a suggestion for a film, television show or new business idea without following your business unit's unsolicited idea procedures.



ADDITIONAL RESOURCES IN THE INTEGRITY SECTION OF YOUR BUSINESS UNIT'S INTRANET

- [Frequently Asked Questions](#)
- Confidentiality policy in your business unit's Employee Handbook



Talk with your supervisor or visit
www.ComcastNBCUniversalListens.com
to learn more about how
to raise a concern.



SECURITY AND EMERGENCY PREPAREDNESS

The safety of our people and operations is critically important at Comcast. We are committed to protecting employees through vigilant security regarding our property, technology and business operations. We have implemented procedures that address the prevention of criminal acts and ensure that employees understand potential threats to our people, operations and facilities. We create and rely on emergency response plans and business continuity plans to ensure key business functions will continue to operate effectively in the event of an emergency. It is the responsibility of every employee to take an active role in helping to ensure the safety of our teams and minimize impacts to our customers and business operations.

WHAT TO KNOW

- We have established policies and procedures for security, business continuity, crisis management and emergency action plans.
- We seek to provide a workplace that is safe and secure. Security threats can include threats to our property, personnel and electronic systems.
- We have zero tolerance for workplace violence.
- We require all users of our facilities, including employees, to have proper authorization to gain entry, and prohibit the sharing of ID badges.
- We require user identification to be displayed at all times in all of our facilities.
- We prohibit the removal of Company property and equipment from our premises without proper authorization.
- We require each location to have an emergency action plan that defines the teams, actions and procedures to minimize injuries and save lives immediately following an incident.
- We require each business group to have a business continuity plan that outlines how the business unit will continue its business functions following an incident should its primary location not be available for an extended period of time.



The Fate of the Furious

Train employees in security and emergency response procedures, and retrain as necessary.

WHAT TO DO

- Protect Company assets against damage, loss, theft or other misuse.
- Train employees in security and emergency response procedures, and retrain as necessary.
- Follow applicable security and emergency response procedures.
- Develop business continuity plans for your business unit, conduct exercises to validate your plans, and train team members.
- Know your security leaders and how to contact them.
- Understand life safety guidelines, including evacuation and shelter-in-place procedures.
- Understand and follow your business unit's emergency action plan, including the communications strategy, business continuity plans and security protocols.
- Follow procedures for maintaining facility security.
- Be alert to data or computer system security threats.
- Be aware of your surroundings; if you see or observe suspicious or threatening activity, notify Security immediately.
- Be alert to and promptly raise any concern about workplace violence to your supervisor, Human Resources representative or Security contact.
- Properly secure your workspace and computer work stations whenever you are away from your workspace for any prolonged period, including at the end of each work day.
- Comply with global immigration rules and travel policies (including Government and Company policies, as applicable), especially for travel to high-risk destinations.
- Understand the proper procedures for handling suspicious mail, email and packages.



WHAT TO WATCH OUT FOR

- Visitors to a Company facility who do not display an employee ID badge or authorized visitor pass.
- Security concerns about your physical surroundings, such as unlocked or damaged doors that are not properly secured or other facility issues.
- Any suspicious, threatening or disruptive behavior or activities.
- Potential physical or computer system security breaches in any of our facilities.
- Emails from unknown senders and/or containing any suspicious or unfamiliar attachments or URLs.
- Unattended or unsecured equipment or property.
- Efforts or offers to circumvent travel safety policies or country entry requirements.

ed. Protected. Home.



ADDITIONAL RESOURCES IN THE INTEGRITY SECTION OF YOUR BUSINESS UNIT'S INTRANET

- [Frequently Asked Questions](#)
- The security section of your business unit's Employee Handbook


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CONFLICTS OF INTEREST

On the job or in your free time, nothing you do should conflict with your responsibilities or duty of loyalty to the Company. Even when nothing wrong is intended, the appearance of a conflict can have negative effects. That is why you must always consider how your actions may appear, and avoid situations that create a real or perceived conflict of interest.

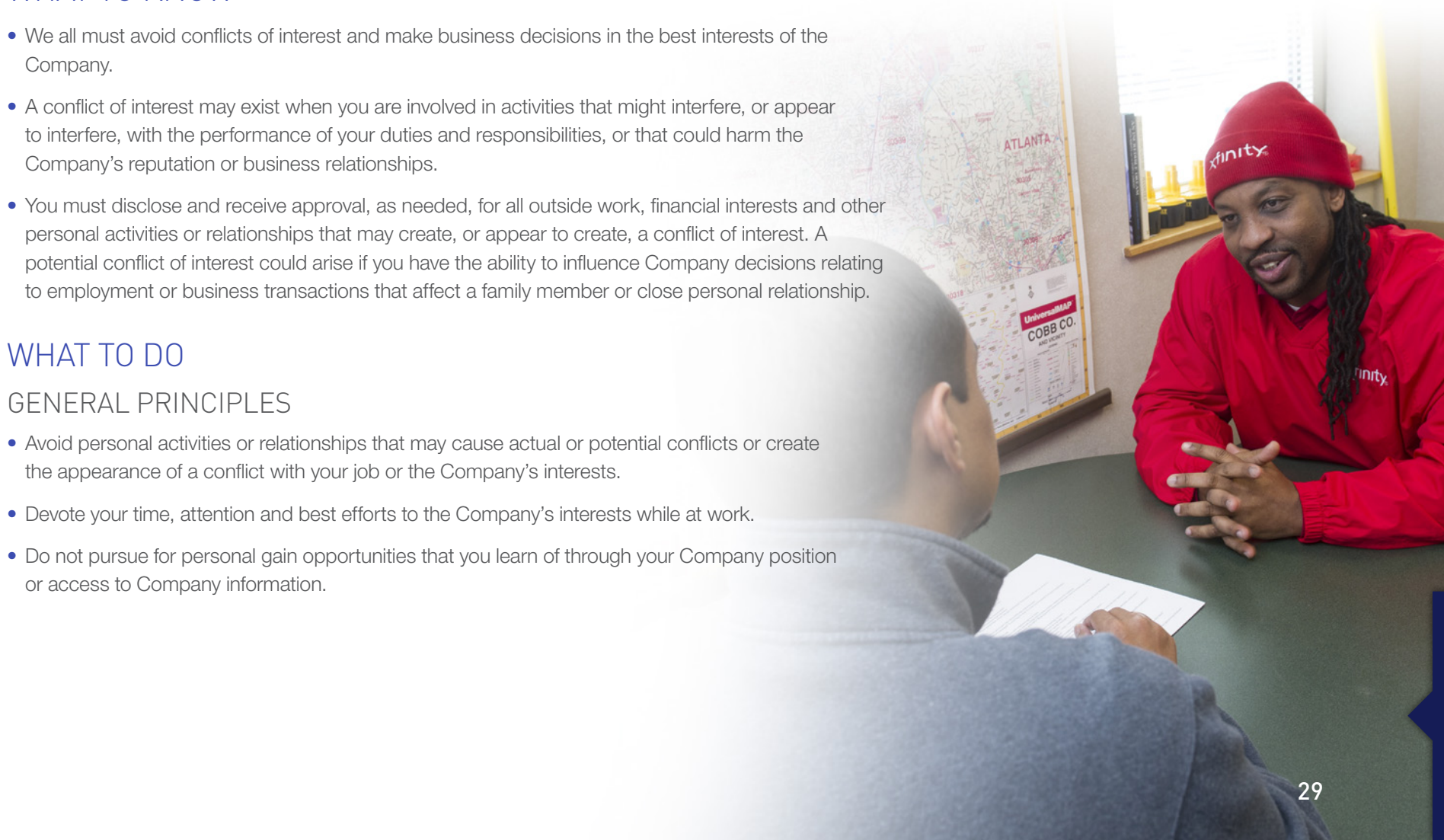
WHAT TO KNOW

- We all must avoid conflicts of interest and make business decisions in the best interests of the Company.
- A conflict of interest may exist when you are involved in activities that might interfere, or appear to interfere, with the performance of your duties and responsibilities, or that could harm the Company's reputation or business relationships.
- You must disclose and receive approval, as needed, for all outside work, financial interests and other personal activities or relationships that may create, or appear to create, a conflict of interest. A potential conflict of interest could arise if you have the ability to influence Company decisions relating to employment or business transactions that affect a family member or close personal relationship.

WHAT TO DO

GENERAL PRINCIPLES

- Avoid personal activities or relationships that may cause actual or potential conflicts or create the appearance of a conflict with your job or the Company's interests.
- Devote your time, attention and best efforts to the Company's interests while at work.
- Do not pursue for personal gain opportunities that you learn of through your Company position or access to Company information.



- Do not use Company assets, information, resources or influence for personal benefit or to promote an outside business or activity of yours, a family member or a close personal relationship. This includes the use of Company facilities, office equipment, e-mail, employee or client information, software or computer applications.
- Speak up if you know of a possible conflict of interest involving a supplier or other business partner, or another employee or other person representing the Company.
- Contact a Company lawyer or [Authorized Approver](#) if you need help determining whether something raises a conflict of interest or how to apply this policy.

The term “outside business” means a company or other for-profit business organization, including a family-owned business.

FAMILY MEMBERS/CLOSE PERSONAL RELATIONSHIPS

- A conflict of interest could arise if you have the ability to influence Company decisions relating to employment or business transactions that involve a family member or close personal relationship.
- Do not:
 - » Direct Company business to, or make Company decisions regarding, an outside business owned or managed by you, a family member or a close personal relationship; or
 - » Make any employment decisions regarding a family member or close personal relationship (including hiring, promoting or directly supervising).

EMPLOYMENT AND OTHER ACTIVITIES OR ASSOCIATIONS OUTSIDE OF THE COMPANY

- Obtain pre-approval from your supervisor *and* an [Authorized Approver](#) *before*:
 - » Working as an employee, consultant, advisor or officer or being a director of an outside business while you are a Company employee.
 - » Participating in outside writing, blogging, lecturing or other activities that draw on proprietary or confidential information of the Company obtained as part of your employment with the Company. For example, seek approval of any activities that may inadvertently disclose proprietary or confidential information about technology trials, product development, scripts or show outcomes.



- The Company encourages you to participate in civic and charitable activities. Obtain pre-approval from your supervisor *and* an [Authorized Approver](#) *before*:
 - » Participating in a non-profit organization (such as a civic or charitable organization) on your own time if such participation might present a conflict of interest or the appearance of a conflict of interest, or potentially harm the Company's reputation or business relationships.
 - » Participating in civic or charitable activities as a representative of the Company or on Company time or using Company resources or assets.

FINANCIAL INTERESTS

- Owning a financial interest in an outside business that has a current or potential business relationship with the Company, such as a supplier, contractor, customer, competitor, potential competitor or company in which the Company has an investment may be a conflict of interest if you have the ability to influence or affect the Company's relationship with that business.
- Obtain pre-approval from an [Authorized Approver](#) *before*:
 - » Owning (either directly or indirectly) stock or any other financial interest in any outside business that has a current or potential business relationship with the Company or is a competitor or potential competitor of the Company. You do not need approval to own such an interest if:
 - › the company is a public company and you purchase stock in the open market (i.e., through a stockbroker and not directly from the company);
 - › you own less than one percent of a traded class of the company's stock; *and*
 - › you do not perform any business function, provide any advice, or have any ability to influence the policies or activities of the company.
 - » Soliciting or accepting any offer (even if unsolicited) to acquire securities (including by having securities reserved for you in an IPO) of any outside business if the outside business or any person making the opportunity available to you on behalf of the outside business has a current or potential business relationship with the Company or is a competitor or potential competitor of the Company. This restriction applies even if you are paying market price for the securities.



WHAT TO WATCH OUT FOR

- Personal relationships that may conflict with your job responsibilities or compromise Company interests.
- Activities that would lead an impartial person to question whether your motivations are consistent with your job or the Company's best interests.
- Situations that could result in personal gain or interfere with your ability to make an objective business decision.



ADDITIONAL RESOURCES IN THE INTEGRITY SECTION OF YOUR BUSINESS UNIT'S INTRANET

- [Frequently Asked Questions](#)
- [List of Senior Attorneys and Authorized Approvers](#)
- Outside employment policy in your business unit's Employee Handbook
- Social media policy in your business unit's Employee Handbook

OTHER APPLICABLE CODE POLICIES

- [Anti-Bribery/Anti-Corruption Laws](#)
- [Business Relationships](#)
- [Gifts and Business Entertainment with Commercial Business Partners](#)
- [Interacting with Governments and Political Activities](#)


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OUR COMMITMENT TO OUR SHAREHOLDERS

We are committed to delivering value to our shareholders while conducting business in an ethical manner. In our day-to-day decisions, we should never take actions to secure short-term goals at the expense of long-term shareholder value. We take responsibility for our actions as individuals and as an organization by reporting information honestly, timely and accurately, maintaining transparent Company records and prohibiting trading on material, nonpublic Company information.

- [Financial Responsibility](#)
- [Insider Trading and Stock Tipping](#)



FINANCIAL RESPONSIBILITY

Financial responsibility principles require us to protect the Company through integrity in record keeping, financial reporting and public disclosures. We have a responsibility to maintain our books and records, prepare our financial statements and make public disclosures in compliance with the law and accounting standards.

WHAT TO KNOW

- We comply with all applicable laws, rules and regulations governing financial accounting and reporting.
- Financial responsibility encompasses:
 - » Honest, fair and accurate financial reporting.
 - » Making full, accurate, timely and understandable public disclosures to government agencies, such as the Securities and Exchange Commission, and the public.
 - » Complying with our system of internal controls.
- Corrections to our financial records and reports that are identified in a timely manner, reported in accordance with our system of internal controls and appropriately corrected within our internal controls system are not violations of this policy.

WHAT TO DO

- Ensure that all books and records:
 - » Are maintained in accordance with applicable law;
 - » Fairly and accurately reflect, in reasonable detail, the transactions or occurrences to which they relate; and
 - » Fairly and accurately reflect, in reasonable detail, our assets, liabilities, revenues and expenses.
- Make sure that our books and records do not contain any false or misleading statements or entries.



- Never intentionally misclassify any transaction as to accounts, departments or accounting periods.
- Do not change accounting or business practices or policies for the sole purpose of enhancing near-term financial performance at the expense of long-term shareholder value, such as by “smoothing” or otherwise managing quarterly or annual results.
- Maintain accurate, appropriate and reasonably detailed documentation to support all transactions.
- Provide all relevant information to, and never conceal information from, our internal auditors or our independent auditors.
- Prepare all external reports and disclosures that are based on our books and records in accordance with generally accepted accounting principles (“GAAP”) and securities laws.
- Manage documents and records in accordance with your business unit’s records and information management policies.
- If you are a professional employee in the areas of accounting, internal audit, finance, financial planning and analysis, investor relations, risk management, tax or treasury, also review and follow the Company’s [Reporting Obligations of Financial Professionals Policy](#).

WHAT TO WATCH OUT FOR

- Financial records or subscriber statistics that appear inaccurate or are not transparent.
- Inaccurate financial reports or statements, such as overstated travel and entertainment expenses or erroneous invoices or timesheets.
- A request to document a transaction in a way that does not accurately reflect its substance.
- Financial results that seem inconsistent with underlying performance.
- Statements or communications that don’t make business sense or are inaccurate.
- An actual or potential conflict of interest involving an employee with financial reporting, accounting or internal controls responsibilities.
- Circumvention of proper review and approval processes.
- Inadequate routines and controls to preserve financial records.



ADDITIONAL RESOURCES IN THE INTEGRITY SECTION OF YOUR BUSINESS UNIT’S INTRANET

- [Frequently Asked Questions](#)
- [Reporting Obligations of Financial Professionals Policy](#)



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INSIDER TRADING AND STOCK TIPPING

In the course of your employment with the Company, whether through a hallway conversation or as part of your professional duties, you may learn of material information about the Company or other companies before it is made public. “Material” information is information that an investor may consider important in deciding whether to buy, sell or hold securities such as stock. You may not buy or sell securities while aware of material information that has not been made public (doing so is known as “insider trading”) or convey such information to others who might trade before that information is made public (doing so is known as “tipping”).

WHAT TO KNOW

- Insider trading and tipping while aware of material, nonpublic information about the Company or any other company is prohibited.
- Examples of material information include earnings announcements; financial forecasts; significant financial developments (including dividend or share repurchase actions); possible acquisitions or divestitures; important product, technology or strategy developments; changes in key personnel; major litigation developments; and governmental investigations.
- “Securities” are broadly defined to include not just stock but also put and call options, debt securities (such as bonds and notes) and any other similar equity or debt or instruments. Additionally, certain forms of hedging or monetization transactions and other complex transactions can present unique insider trading risks.
- Insider trading and tipping is against the law. It can harm the Company’s reputation and can subject you to severe penalties including imprisonment, disgorgement of profits, substantial fines and monetary damages. Those who know or recklessly disregard that an employee was engaging in insider trading and fail to take appropriate steps to prevent it may also be subject to similar consequences.

WHAT TO DO

- Do not buy or sell, either directly or indirectly through another person or entity, securities of the Company or any other company while you are in possession of material, nonpublic information.

- For any material, nonpublic information you know about a company, wait until the information becomes public before:
 - » Buying or selling the security;
 - » Recommending or suggesting that anyone else buy or sell the security.
- Do not disclose any material, nonpublic information about the Company or any other company that you learn in connection with your employment to anyone until that information is generally available to the public. This includes not disclosing this information to analysts, shareholders or other securities market professionals.
- Do not make personal financial decisions involving the employee stock purchase plan if you are aware of material, nonpublic information about the Company.
- Follow procedures to safeguard any material or other sensitive information you learn about the Company, including not disclosing it outside the Company unless necessary for your business activities and proper controls are in place. You also should maintain the confidentiality of information that you learn in the course of your service about suppliers, contractors, customers, companies in which the Company has an investment and other third parties.
- If applicable to your role or business unit, learn and follow any additional requirements relating to buying and selling securities (such as the preclearance of personal trades or being subject to a blackout policy).
- Contact a [Senior Attorney](#) if you have questions about this policy, including any concern about trading in a security or about whether any information could be deemed material.

WHAT TO WATCH OUT FOR

- Buying or selling a security when you have access to information that you believe will make the price go up or down once it is publicly announced. Even after the information is released to the public, there must be adequate time for the market to become fully aware of the information before it is considered to be public information.
- Buying or selling a security before a significant Company announcement.
- Talking to others (both inside and outside the Company) who do not have a need to know information about what you have been working on, where you have been traveling on Company business or who has visited the office.



ADDITIONAL RESOURCES IN THE INTEGRITY SECTION OF YOUR BUSINESS UNIT'S INTRANET

- [Frequently Asked Questions](#)
- [Fair Disclosure Policy](#)



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to raise a concern.

OUR COMMITMENT TO OUR BUSINESS PARTNERS

A critical part of doing business is partnering with others. We believe that business relationships are built on trust and mutual advantage. That is why we make every effort to earn the trust of our suppliers, contractors, customers and other business partners, including government entities. Our commitment to operating ethically and honestly in our business relationships is essential to maintaining our reputation for trustworthiness. We strive to only do business with others who share our commitment to ethical and lawful business behavior.

- [Business Relationships](#)
- [Gifts and Business Entertainment with Commercial Business Partners](#)
- [Interacting with Governments and Political Activities](#)



BUSINESS RELATIONSHIPS

We value our business relationships and are committed to doing what's right for our customers, suppliers and other partners. Our business relationships are based on lawful, efficient and fair practices. We interact honestly and with integrity in the marketplace and expect our partners to do the same. We also expect our suppliers to obey the law, including laws that require them to treat workers fairly, provide a safe and healthy work environment and protect environmental quality, as well as laws prohibiting trafficking in persons and forced, compulsory and child labor.

WHAT TO KNOW

- We do what's right for our customers by being honest and forthright in our dealings and communications with them and delivering on what we promise.
- We conduct business in a responsible manner and strive to provide an exceptional experience to our customers in every interaction.
- We are committed to maintaining and improving customer satisfaction.
- We strive to do business only with suppliers who uphold our values and comply with applicable laws and standards governing labor, health and safety.
- We provide competitive opportunities, where practical, to all suppliers.
- We promote respect for human rights in our supply chain and other business activities.

WHAT TO DO

GENERAL PRINCIPLES

- Conduct all business in a responsible manner.
- Treat our suppliers, contractors, customers, other business partners and competitors with the same level of respect and professionalism that you expect them to provide.



- Help us build long-term business relationships and be a model of integrity in all of your business interactions.
- Follow all applicable procedures to safeguard confidential and proprietary information entrusted to us by our suppliers, contractors, customers and other business partners.
- Compete fairly in the marketplace.

CUSTOMERS

- Provide the highest quality experience possible for all of our customers regardless of where or how the interaction takes place.
- Be honest, fair and transparent in all interactions with customers.
- Provide sufficient information so customers can make informed decisions about our products and services.
- Follow all Company sales practices, including helping customers to access and determine what products and services best meet their needs and terminate services without hassle.

SUPPLIERS

- Conduct business only with suppliers that comply with national, local and other applicable legal requirements and Company guidelines.
- Unacceptable supplier practices include:
 - » Employing workers younger than the required minimum age or the age of 16, whichever is higher.
 - » Using forced, prison or indentured labor, or workers subject to any form of compulsion or coercion.
 - » Failure to observe applicable environmental laws and regulations.
 - » Failure to observe applicable laws and regulations governing wage and hour, days of service and overtime payment.
 - » Failure to provide workers with a workplace that meets applicable health and safety standards.
 - » Failure to maintain and enforce policies requiring adherence to lawful business practices, including a prohibition against bribery.
- Provide a competitive opportunity for diverse suppliers to earn our business.

- Understand and select suppliers in accordance with your business unit's sourcing and procurement procedures or practices (including concerning when to engage sourcing and competitive bidding).
- Conduct appropriate information security reviews before granting a supplier access to the Company's data or digital infrastructure.
- Maintain open, honest dialogue with suppliers, consistent with good business practices.
- Evaluate all supplier offerings on the basis of quality, reliability, performance, price, service and technical requirements.
- Avoid potential conflicts of interest regarding suppliers or potential suppliers.
- Promptly raise any concern regarding supplier relationships, including a concern about a suspected human rights violation in our supply chain, to your supervisor or a Company lawyer, or use another employee [resource](#) to speak up.

WHAT TO WATCH OUT FOR

- Inaccurate entries in customer records.
- Improper use of a promotion or offer to secure a customer transaction.
- Unsafe conditions in supplier facilities.
- Supplier employees who appear to be underage or subject to coercion.
- Observable environment hazards in supplier facilities.
- Solicitation, receipt or use of a supplier's proprietary data other than as authorized by such supplier.



ADDITIONAL RESOURCES IN THE INTEGRITY SECTION OF YOUR BUSINESS UNIT'S INTRANET

- [Frequently Asked Questions](#)
- Your business unit's sourcing policy, if applicable

OTHER APPLICABLE CODE POLICIES

- [Anti-Bribery/Anti-Corruption Laws](#)
- [Conflicts of Interest](#)
- [Gifts and Business Entertainment with Commercial Business Partners](#)
- [Interacting with Governments and Political Activities](#)
- [International Trade Controls](#)
- [Money Laundering Prevention](#)
- [Privacy](#)



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GIFTS AND BUSINESS ENTERTAINMENT WITH COMMERCIAL BUSINESS PARTNERS

Gifts and business entertainment can provide opportunities to build business relationships, network with our Business Partners and promote products and services. If not handled appropriately, however, gifts or business entertainment can damage the Company's reputation and even violate the law. That is why it is the responsibility of every employee to understand the principles to consider before offering or accepting a gift or business entertainment and to know when pre-approval is required.

This policy does not apply to gifts or business entertainment offered to, or for the benefit of, a Government Official. All gifts, business entertainment or other things of value offered to Government Officials require pre-approval from a [Senior Attorney](#) and must comply with the guidance set forth in the [Interacting with Governments and Political Activities policy](#) and the [Anti-Bribery/Anti-Corruption Laws policy](#).

WHAT TO KNOW

GENERAL PRINCIPLES

- All gifts and business entertainment must be: (i) offered or accepted with a valid business purpose; (ii) offered or accepted without the purpose of influencing a business decision or official action; (iii) prudent and reasonable by local and industry standards (including in terms of value and frequency); (iv) proper in appearance and without risk of embarrassment or harm to the Company's reputation; and (v) compliant with applicable laws and regulations.
- All gifts and business entertainment must comply with the [Anti-Bribery/Anti-Corruption Laws policy](#). This means, among other things, that you may never offer, accept or solicit, directly or indirectly, gifts or business entertainment to or from a Business Partner if it is intended or could reasonably appear to be intended to influence any business actions or decisions or to obtain or retain an improper business or other advantage.

WHAT TO DO

GIFTS AND BUSINESS ENTERTAINMENT

- Follow the requirements in your [Business Unit Gifts and Business Entertainment Guidelines](#) before offering or accepting a gift or business entertainment to or from a Business Partner, or to others at the request of or at the direction of a Business Partner.
- Make sure that your recording of any gifts or business entertainment is clear and accurate in any applicable expense report, pre-approval request or other Company record, and that those documents reflect the true nature of the transaction.

CASH

- Never offer or accept a gift of cash, regardless of amount. This includes a cash equivalent, such as a pre-paid credit or debit card, bank check, money order, loan, investment security or other negotiable instrument.

SOLICITATION OF BUSINESS PARTNERS

- Do not solicit a gift or business entertainment, regardless of value, from a Business Partner for any non-charitable purpose unless you have obtained the appropriate pre-approvals as required by your [Business Unit Gifts and Business Entertainment Guidelines](#).
- Obtain pre-approval from the Comcast NBCUniversal Community Investment Department before soliciting a Business Partner for a charitable purpose using the Company's name or your position at the Company.

USE OF PERSONAL FUNDS

- Do not seek to avoid the requirements of this policy by using personal funds to pay for a gift or business entertainment for a Business Partner if you are acting as an employee of the Company or if the gift or business entertainment relates to a Company matter.

WHAT TO WATCH OUT FOR

- Offering or accepting a gift or business entertainment that exceeds the dollar limits or other guidelines established by your business unit.
- Offering or accepting frequent gifts and business entertainment to or from the same Business Partner.
- Incomplete or inaccurate records pertaining to a gift or business entertainment activity.



ADDITIONAL RESOURCES IN THE INTEGRITY SECTION OF YOUR BUSINESS UNIT'S INTRANET

- [Business Unit Gifts and Business Entertainment Guidelines](#)
- [Frequently Asked Questions](#)
- [List of Senior Attorneys and Authorized Approvers](#)

OTHER APPLICABLE CODE POLICIES

- [Anti-Bribery/Anti-Corruption Laws](#)
- [Business Relationships](#)
- [Conflicts of Interest](#)
- [Interacting with Governments and Political Activities](#)



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INTERACTING WITH GOVERNMENTS AND POLITICAL ACTIVITIES

We conduct business with U.S. and non-U.S. national, state and local governments, government-owned enterprises and other government entities such as public schools, libraries and hospitals. In the course of our business activities, we frequently interact with Government Officials. In every instance, employees must adhere to the highest ethical standards and comply with all applicable laws and regulations, including those relating to offering gifts and business entertainment to Government Officials or special requirements for government contracts, political contributions and lobbying activities.

Violating any of these laws could result in criminal and civil penalties, a ban or restriction on the Company's ability to conduct business and/or reputational harm. That is why this policy requires employees to obtain appropriate pre-approval before engaging in certain activity involving a Government Official.

WHAT TO KNOW

- When interacting with a government or a Government Official, complex and often strict laws can apply. These laws regulate our Company's activities by, for example, prohibiting or restricting gifts, business entertainment or political contributions to certain Government Officials; or requiring Company employees or representatives who attempt to influence a government decision by engaging in lobbying activities to register and report as lobbyists or requiring the Company to register and report as a lobbyist-employer. There are also requirements and restrictions that may arise when our Company bids on government contracts.
- As set forth in this policy, you must obtain pre-approval from your business unit's General Counsel before engaging in certain activities with a government entity or Government Official. Pre-approval from the Comcast Corporation Political Affairs Department is also required and can be obtained by your business unit's General Counsel on your behalf.

WHAT TO DO

OFFERING A GIFT OR BUSINESS ENTERTAINMENT TO A GOVERNMENT OFFICIAL

- Obtain pre-approval from a [Senior Attorney](#) *before* providing or offering a gift or business entertainment to a Government Official or for the benefit of a Government Official.
 - » This requirement applies to a gift or business entertainment offered or provided to any other person or entity, including a charity or family member, at the request of or for the benefit of a Government Official.
 - » This requirement applies even if you pay for the gift or business entertainment from your own personal funds. Gifts that are clearly unrelated to Company business, such as a holiday gift for your child's public school teacher, are not subject to this requirement.
 - » Even de minimis gifts or business entertainment offered to a Government Official must be pre-approved.
 - » All gifts and business entertainment must comply with the [Anti-Bribery/Anti-Corruption Laws policy](#). This means, among other things, that you may never offer, directly or indirectly, a gift or business entertainment to a Government Official if it is intended or could reasonably appear as intended to influence an official action or decision or to obtain or retain an improper business or other advantage.
- Never offer a gift of cash, regardless of amount, to or on behalf of a Government Official. This includes a cash equivalent, such as a pre-paid credit or debit card, bank check, money order, loan, investment security or other negotiable instrument.
- Make sure that all gifts, business entertainment, gratuities or any other thing of value are clearly and accurately described in any applicable expense reports, pre-approval requests or other Company records, and that those documents reflect the true nature of the transaction.

CONTRACTING WITH A GOVERNMENT ENTITY

- Obtain required pre-approvals from a Company lawyer before bidding for, entering into or renewing any government contract. This is necessary because many government contracts are subject to special rules that can create obligations for the entire Company.
- Follow government contractual requirements when engaging subcontractors or purchasing materials in fulfillment of a government contract.

Never offer a gift of cash, regardless of amount, to or on behalf of a Government Official.



ENGAGING IN LOBBYING

- Obtain pre-approval from your business unit's General Counsel before engaging in lobbying activities.
 - » As a lobbyist-employer, the Company is subject to various federal, state and local laws which may require it, its employees or outside persons who engage in covered lobbying activity to comply with certain registration and reporting requirements. Obtaining pre-approval before engaging in lobbying activities ensures that the Company complies with these regulations.

HIRING A THIRD PARTY

- Follow Company due diligence, approval and contractual requirements when hiring or retaining a third party to interact, directly or indirectly, with a Government Official on behalf of the Company.

HIRING A GOVERNMENT OFFICIAL

- Obtain pre-approval from your business unit's General Counsel before taking any actions to potentially hire any Government Official as an employee or consultant for the Company, as well as any individual who is related to or has been referred by a Government Official.
- Depending on the jurisdiction, a Government Official may need to disclose contacts with a company with which he or she is negotiating prospective employment or recuse him or herself from business affecting the company. Post-employment restrictions may ban a former Government Official from working on certain matters or meeting with his or her former agency for a period of time after leaving the government.
- Also, because employment may constitute a thing of value, all employment offers to Government Officials must comply with the [Anti-Bribery/Anti-Corruption Laws policy](#).

MAKING OR SOLICITING A POLITICAL CONTRIBUTION

- Never use Company funds or other Company assets to make a political contribution without obtaining pre-approval from your business unit's General Counsel.
 - » Federal and certain state and local laws generally prohibit the use of corporate funds or resources for political contributions. Under no circumstances may you cause the Company to reimburse or compensate anyone for their political contributions.

- » In order to prevent an illegal in-kind corporate political contribution, do not use Company facilities, office space or personnel in connection with volunteer activity (such as fundraising) for a political campaign, or perform volunteer activity for a political campaign during work hours, without obtaining pre-approval from your business unit's General Counsel.
- If you are an officer, director or other employee who receives a notice from the Company that you are subject to state or local "pay-to-play" laws, you must obtain pre-approval from your business unit's General Counsel before making or soliciting a personal political contribution.

ENGAGING IN PERSONAL POLITICAL ACTIVITIES

- Do not engage in personal political activities other than on your own time. Employees are permitted and encouraged to participate in their personal capacity in federal, national, state and local political activities in compliance with applicable laws, this policy and the [Anti-Bribery/Anti-Corruption Laws policy](#), however, you should not engage in overt, visible or partisan political activity that gives the appearance that you are expressing the views of the Company, or use the Company's name in connection with such activities, without obtaining pre-approval from your business unit's General Counsel.
- Obtain pre-approval from your business unit's General Counsel *before* running for election or accepting appointment to a national, state or local public office. The term "public office" is interpreted broadly, and includes, but is not limited to, school boards, local government councils and all governmental offices and positions.

WHAT TO WATCH OUT FOR

- Invitations to Government Officials to attend a business entertainment event. Such invitations must be pre-approved by a [Senior Attorney](#).
- Donations to non-profit organizations that have relationships with, or are solicited by, a Government Official. For example, we must comply with U.S. lobbying rules that require the reporting of donations to organizations with certain relationships with a U.S. federal official, as well as expenses related to events that honor or recognize a U.S. federal official. We have established separate procedures to capture information relating to these payments in order to comply with these reporting requirements.
- Collecting or forwarding political contribution checks from other people to a federal, state or local candidate, political party or political committee. Any such "bundling" may be illegal and requires the pre-approval of your business unit's General Counsel.
- Fundraising for a political campaign while at work. Such activity requires pre-approval from your business unit's General Counsel.



ADDITIONAL RESOURCES IN THE INTEGRITY SECTION OF YOUR BUSINESS UNIT'S INTRANET

- [Frequently Asked Questions](#)
- [List of Senior Attorneys
and Authorized Approvers](#)

OTHER APPLICABLE CODE POLICIES

- [Anti-Bribery/Anti-Corruption Laws](#)
- [Business Relationships](#)
- [Conflicts of Interest](#)
- [Gifts and Business Entertainment
with Commercial Business Partners](#)



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OUR COMMITMENT TO THE LAW

A fundamental obligation that we owe to the nations and communities in which we do business is to obey the law. We adhere to all applicable laws everywhere we do business. There is no business reason, no management pressure, no unwritten understanding that ever justifies violating the law. If you feel pressured to violate a law, immediately contact a Company lawyer or use another [employee resource](#) to speak up. While this commitment refers to all applicable laws, a few areas are of particular significance and applicability.

- [Complying with Competition Laws](#)
- [Anti-Bribery/Anti-Corruption Laws](#)
- [Money Laundering Prevention](#)
- [International Trade Controls](#)

COMPLYING WITH COMPETITION LAWS

Competition laws, known as antitrust laws in the United States, are designed to ensure open and vigorous competition in the marketplace. Agreements or understandings among competitors that limit or restrict competition are, in most circumstances, unlawful. Unilateral actions that injure or prevent competition can also be illegal if undertaken by a company with significant market power. We comply with all applicable competition laws, rules, regulations, decrees and orders.

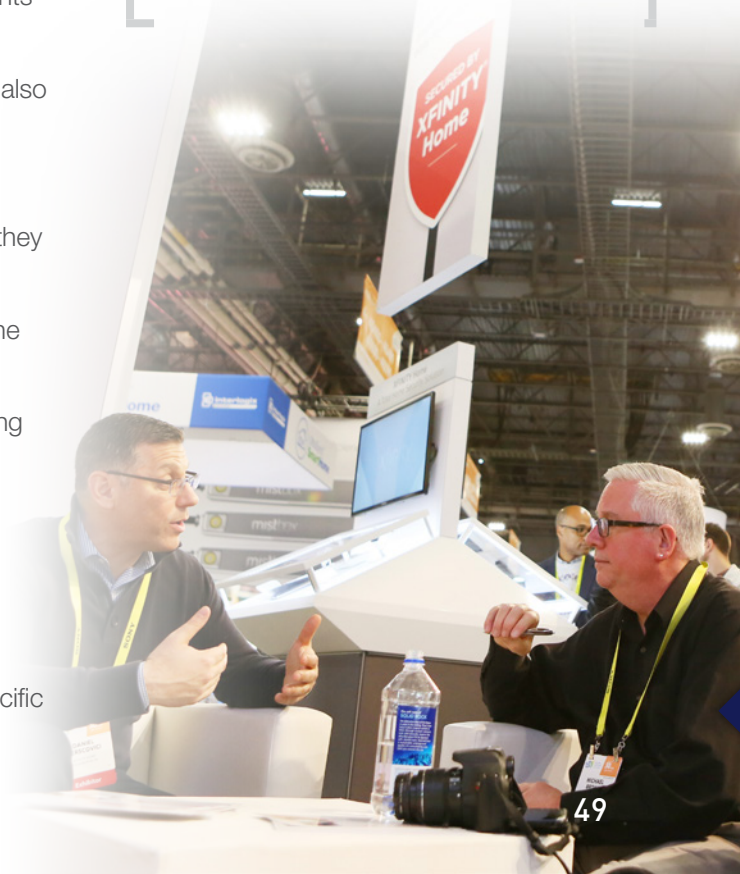
WHAT TO KNOW

- Competition laws are complex and their application is fact specific. Always proceed with caution and seek legal guidance when you're not sure.
- Competition laws prohibit any type of agreement that unreasonably restrains trade. Examples include agreements between or among competitors to fix prices or other competitive terms and agreements to allocate sales, customers or service territories.
- Unilateral efforts to injure or prevent competition by companies with significant market power may also violate antitrust laws.
- An entity may be both a valued partner for some purposes and a competitor for others.
- Government agencies can review proposed transactions and investigate Company activities that they believe may be anticompetitive.
- The Company is subject to several consent decree agreements with the Government relating to the antitrust laws, which impose additional obligations on the Company.
- Violating competition laws or applicable consent decrees can have severe consequences, including criminal prosecution, criminal and civil fines and large damage awards.
- You can find detailed guidance regarding compliance with competition laws in the [Compliance Guide to the Antitrust and Competition Laws](#).

WHAT TO DO

- Understand and follow the [Compliance Guide to the Antitrust and Competition Laws](#) and any specific business unit guidelines regarding complying with competition laws or consent decrees.

Agreements arise in many forms and can be express or implied, formal or informal, written or oral.



- Unless you have received specific guidance from a Company lawyer, do not:
 - » Discuss the Company's current or future plans or any pricing information with a competitor.
 - » Share confidential Company information with a competitor.
 - » Agree with one or more competitors on any decision or course of action.
 - » Price any product or service below cost.
 - » Seek to raise a competitor's cost of doing business, such as preventing suppliers or contractors from dealing with a competitor, or agreeing to costly contractual requirements on the condition that a competitor meets the same obligations.
 - » Seek to restrain a competitor from doing business.
 - » Seek to control the pricing set by another company, even if it is not a direct competitor.
 - » Enter into a joint venture or other collaboration involving an actual or potential competitor.
 - » Agree with a competitor that you will not hire each other's employees, or discuss with a competitor compensation levels of each other's employees.
- Use caution when entering into any exclusivity arrangement. Evaluating such agreements often requires careful weighing of many factors. Contact a Company lawyer with any questions.
- Do not enter into any agreements or understandings, or exchange information, with a competitor regarding prices, rates, terms or conditions of sale, bids, costs, profit margins, market share, business strategy or other confidential aspects of competition.
- Even where there are lawful reasons to communicate with a competitor (e.g., where business issues arise from a genuine buyer-seller relationship), take care to avoid the appearance of anti-competitive behavior and limit discussions to the business at issue.
- Avoid or, if that is not possible, exercise care in situations where competitors are present that could result in violation of the law, even unintentionally. Examples include trade shows and conferences, meetings of industry trade associations and communications relating to legitimate joint ventures.

WHAT TO WATCH OUT FOR

- Discussions with competitors at a trade show or other industry event.
- Discussions with competitors in connection with other legitimate activities, like joint ventures.
- Job-related discussions with personal friends who are employees of competitors.



ADDITIONAL RESOURCES IN THE INTEGRITY SECTION OF YOUR BUSINESS UNIT'S INTRANET

- [Frequently Asked Questions](#)
- [Compliance Guide to the Antitrust and Competition Laws](#)
- Confidentiality policy in your business unit's Employee Handbook



Talk with your supervisor or visit
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to raise a concern.

ANTI-BRIBERY/ANTI-CORRUPTION LAWS

Bribery is illegal, and we prohibit bribery of any kind. Providing anything of value, including gifts or business entertainment, to influence any actions or decisions of a Government Official or Business Partner or to otherwise gain an improper advantage in any situation is never acceptable and exposes you and the Company to criminal sanctions and/or civil liability pursuant to national, state and local anti-bribery laws, including the U.S. Foreign Corrupt Practices Act, the U.K. Bribery Act, and similar anti-corruption laws of other countries. We prohibit improper payments in all business dealings, with governments or in the private sector, in every country in the world.

WHAT TO KNOW

- You must never compromise the Company's reputation or integrity by engaging in, or appearing to engage in, bribery or any other form of corruption.
- You may not offer or promise (directly or indirectly) gifts, business entertainment or other things of value to anyone—including Government Officials, Business Partners or other third parties—if it is intended or could reasonably appear as intended to influence official or business actions or decisions or obtain or retain an improper business or other advantage.
- You may not solicit or accept gifts, business entertainment or other things of value from anyone if it is intended or could reasonably appear as intended to improperly influence your actions or decisions on behalf of the Company.
- You may not falsify any book, record or account that relates to the business of our Company or Business Partners, or the disposition of our assets.

 The terms "[gift](#)," "[business entertainment](#)," "[Business Partner](#)" and "[Government Official](#)" are defined in the [Glossary](#).

Suits on USA

WHAT TO DO

GIFTS OR BUSINESS ENTERTAINMENT RELATING TO GOVERNMENT OFFICIALS AND BUSINESS PARTNERS

- Government Officials: Regardless of value, obtain pre-approval from a [Senior Attorney](#) and comply with the [Interacting with Governments and Political Activities policy](#).
- Business Partners: Comply with the [Gifts and Business Entertainment with Commercial Business Partners policy](#) and your [Business Unit Gifts and Business Entertainment Guidelines](#).
- These policies also apply to gifts or business entertainment provided or offered to any other person or entity, such as a charity or family member, at the request of or for the benefit of a Government Official or Business Partner.

HIRING THIRD PARTIES

- Follow Company due diligence, approval and contractual requirements when selecting and hiring third parties to represent the Company to ensure that they are reputable and qualified, and that they agree to comply with applicable anti-corruption laws and policies.
- Obtain pre-approvals as required by your business unit before entering into an agreement with a third party who will have direct or indirect contact with a Government Official on behalf of the Company.

MAINTAINING ACCURATE BOOKS AND RECORDS

- Make sure that all financial transactions are clearly and accurately recorded in the Company's books and records and that those records contain reasonable detail and reflect the true nature of the transactions.

SPEAK UP IF YOU SUSPECT IMPROPER ACTIVITY

- Contact a Company lawyer immediately, or use another employee [resource](#) to speak up, if you are concerned that an improper payment or other thing of value has been or will be offered, directly or indirectly, by the Company or an employee or third party working on its behalf to any Government Official, Business Partner or someone else in the Company, or if anyone offers you an improper payment or other thing of value.

WHAT TO WATCH OUT FOR

- Background information about existing or potential third parties that indicates:
 - » Allegations of improper business practices.
 - » Reputation for bribes.
 - » Family or other relationships involving a Government Official.
- Any request for a suspicious payment (such as a payment in cash or payment directed to someone not related to the transaction) or other unusual financial arrangement.
- Any suggestion to hire or direct Company business through a specific third party due to a “special relationship.”
- Any request to pay unusually high compensation that is disproportionate to the services provided, or not consistent with reasonable business practices.
- Any Business Partner who is unwilling to agree to anti-corruption provisions in its contract.



ADDITIONAL RESOURCES IN THE INTEGRITY SECTION OF YOUR BUSINESS UNIT'S INTRANET

- [Business Unit Gifts and Business Entertainment Guidelines](#)
- [Frequently Asked Questions](#)
- [List of Senior Attorneys and Authorized Approvers](#)

OTHER APPLICABLE CODE POLICIES

- [Business Relationships](#)
- [Conflicts of Interest](#)
- [Gifts and Business Entertainment with Commercial Business Partners](#)
- [Interacting with Governments and Political Activities](#)



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MONEY LAUNDERING PREVENTION

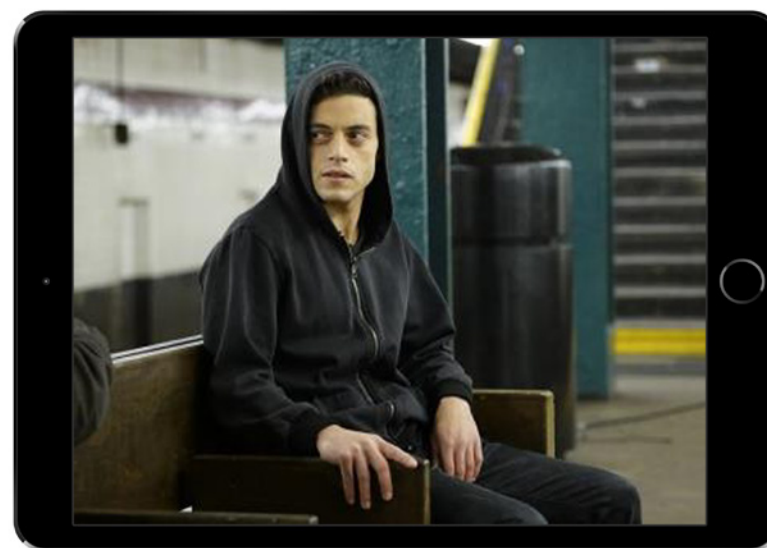
We are committed to complying with all applicable anti-money laundering laws, conducting business with reputable partners and receiving funds only from legitimate sources. Money laundering is the attempt to disguise or “launder” the proceeds of criminal activity to make the source appear legitimate. Such proceeds may derive from a wide range of illegal activity, such as organized crime, narcotics trafficking, trade violations and fraud. Money laundering schemes may involve disguising the origin of funds, or transferring funds through third parties (such as a supplier) or through financial institutions, and can involve checks, wire transfers and investments in every type of business. Many countries, including the United States, have enacted laws against money laundering. The mere acceptance of funds that are known or believed to derive from a crime can be sufficient to impose criminal liability.

WHAT TO KNOW

- We take reasonable steps, based on the level of risk, to protect against attempts to launder money through the Company. This includes only accepting certain forms of payment and performing reasonable due diligence on our suppliers, contractors, customers and other business partners.
- Our level of due diligence will be higher where the party is located in a country or region with a greater risk of money laundering or related activity.

WHAT TO DO

- If you are responsible for contracting with business partners or processing or accepting payments, know the money laundering prevention guidelines applicable to your business. Contact your finance department for details on these guidelines.
- Contact a Company lawyer immediately, or use another employee [resource](#) to speak up, if you encounter suspicious activity or if you have any questions or concerns before proceeding further with the transaction.



Mr. Robot on USA

WHAT TO WATCH OUT FOR

- Any supplier, contractor, customer or other business partner who hesitates or is unwilling to provide requested background information.
- Any request for an unacceptable form of payment, such as cash or a payment directed to or received from someone not related to the transaction, or other unusual financial arrangement, such as a request for transactions to go through more than one bank.
- Any request to conduct transactions with unknown financial institutions or financial institutions outside the country where the transaction is occurring or where the business partner has operations.
- Overpayments followed by requests for refunds.
- Transactions that occur in regions we have identified as high-risk and known for drug trafficking, terrorist or other criminal activities.
- Transactions that are unusual for a supplier's, contractor's, customer's or other business partner's trade or business.
- Any request to make an exception to the Company's policies or procedures.



ADDITIONAL RESOURCES IN THE INTEGRITY SECTION OF YOUR BUSINESS UNIT'S INTRANET

- [Frequently Asked Questions](#)

OTHER APPLICABLE CODE POLICIES

- [Business Relationships](#)



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INTERNATIONAL TRADE CONTROLS

International trade control (“ITC”) laws regulate the transfer of goods, software, services and technology across borders and the conduct of business with certain countries, entities and individuals. ITC laws include export and import regulations, as well as economic sanctions, and are often based on national security and foreign policy concerns. In order to do business in today’s global environment, we need to understand and comply with applicable ITC laws and regulations, both in the United States and in other locations where we do business.

WHAT TO KNOW

- The export of certain items may require government authorization, depending on what is being exported, what it will be used for, what country it is going to and who will receive it.
- A wide range of transfers of goods, software, services or technology across national borders and, in some cases, to foreign entities or individuals, even within the United States, may constitute exports. This includes a broad range of activities such as physical shipments, technical presentations, emails, briefings, trainings or access to electronic databases.
- U.S.-based ITC laws generally prohibit transactions or dealings with parties designated on denied or restricted parties lists, and with certain countries subject to U.S. embargoes (including with persons or entities in these countries and the governments of these countries). Similar regimes apply in many other jurisdictions.
- U.S. law prohibits U.S. companies and their affiliates from cooperating in or supporting foreign boycotts that are not supported by the United States (e.g., the Arab League boycott of Israel).

WHAT TO DO

- Contact a Company lawyer to determine whether pre-clearance is required to export goods, software, services or technology to a foreign country or foreign national.
- Conduct prospective third party screening against government restricted and denied parties lists as required by your business unit.

- Do not conduct transactions or dealings with countries subject to U.S. embargoes without written pre-approval from a Company lawyer. Contact a Company lawyer for a current list of sanctioned countries / territories.
- Report a request to comply with a foreign boycott to a Company lawyer.
- Provide complete and accurate information when completing customs forms and other required documents.
- Do not retain a third party to handle customs matters or other cross-border shipments without performing due diligence and obtaining approvals required by your business unit.

WHAT TO WATCH OUT FOR

- Business activities involving the export of sophisticated equipment, software or technology.
- Any dealing or transaction (e.g., shipment, communication or other business activity) involving an entity or individual in or affiliated with a sanctioned country.
- Documents, including contracts, requests to bid, letters of credit, purchase orders, shipping and customs documents, certificates of origin and questionnaires that include words such as “boycott,” “blacklist,” “whitelist” or similar terms.



ADDITIONAL RESOURCES IN THE INTEGRITY SECTION OF YOUR BUSINESS UNIT'S INTRANET

- [Frequently Asked Questions](#)

OTHER APPLICABLE CODE POLICIES

- [Anti-Bribery/Anti-Corruption Laws](#)
- [Business Relationships](#)
- [Complying with Competition Laws](#)
- [Interacting with Governments and Political Activities](#)



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GLOSSARY OF TERMS

GLOSSARY OF TERMS

Business Entertainment – “Business entertainment” includes the following when both the offeror and recipient are present: (i) meals; (ii) entertainment; (iii) recreational, cultural or sporting events; or (iv) other activities.

Business Partner – A “Business Partner” is a current or potential supplier, contractor, customer or other business partner, who is not a Government Official.

Gift – A “gift” is anything of value, whether tangible or intangible, for which the recipient does not pay the retail or fair market value, if any. A “gift” includes cash, gift certificates or gift cards, products, services, transportation, lodging, discounts, promotional items, contributions to a charity or other organization, the recipient’s use of the offeror’s time, equipment or facilities, and personal favors such as recommending the recipient or his or her family member in an application. A “gift” also includes the following if not attended by the offeror: (i) meals; (ii) entertainment; and (iii) tickets, passes or other access to recreational, cultural or sporting events.

Government Contract – A “government contract” is an agreement with any U.S. or non-U.S. federal, national, state, provincial or local government entity. This includes contracts with quasi-government entities, such as state-owned or state-run broadcasters, hospitals, universities, port authorities and convention centers and arenas.

- Examples of the Company’s government contracting business include: (i) providing cable, internet, phone or other services to government entities, including public schools, libraries, hospitals, universities, authorities or commissions; (ii) licensing content to government entities; (iii) production-related agreements (including participating in tax credit programs or trade-outs with local tourism agencies); (iv) advertising by government agencies or quasi-government entities; (v) management agreements for government-owned facilities; and (vi) offering services and goods to municipal facilities.

Government Official – A “Government Official” is any elected, appointed or nominated official (regardless of rank or level), officer, employee or other person acting as a representative (or any candidate for an office) of any: (i) government entity, including a government agency, department, board, commission or instrumentality; (ii) government-controlled entity or instrumentality; (iii) public international organization; or (iv) political party.

Lobbying – “Lobbying” activity generally includes attempts to influence legislation, rulemaking, ratemaking or other official government actions of agencies, including the decision to enter into a contract or other financial arrangement with the Company. “Grassroots” activity, where the public or employees are encouraged to contact a Government Official in order to influence a government decision, may also be considered lobbying activity.

Outside Business – An “outside business” is a company or other for-profit business organization, including a family-owned business.

Political Contribution – A “political contribution” is any benefit provided to a national, federal, state or local candidate, candidate campaign, political party, political committee (e.g., a political action committee [“PAC”], inaugural or ballot measure committee), political convention, any entity exempt from federal income taxes under Section 527 of the U.S. Internal Revenue Code or a 501(c)(4) social welfare organization. This includes monetary contributions (e.g., a corporate check or purchase of tickets to a political fundraiser) as well as “in-kind” contributions (e.g., the use of corporate personnel or facilities, or the donation of free airtime to a candidate).

