



Statement On Supply Chain Values 2019

Comcast is a global media and technology company. Comcast Cable is one of the United States' largest video, high-speed internet, and phone providers to residential customers under the Xfinity brand, and also provides these services to businesses. It also provides wireless and security and automation services to residential customers under the Xfinity brand. NBCUniversal is global and operates news, entertainment and sports cable networks, the NBC and Telemundo broadcast networks, television production operations, television station groups, Universal Pictures, and Universal Parks and Resorts. Combined, Comcast Cable and NBCUniversal have more than 150,000 employees operating around the world.¹

Comcast is committed to operating honestly and with integrity wherever it does business. We recognize that human trafficking, and other forms of mistreatment that can amount to modern slavery, are serious human rights issues impacting millions of people worldwide. As such, we seek to comply with applicable laws and standards around the world governing labor and health and safety, including those prohibiting human trafficking and forced, compulsory or child labor. We expect our business partners to do the same.

In this Statement we explain the steps taken within Comcast to identify and address modern slavery and human trafficking in our businesses and supply chains in our last financial year, 1 January – 31 December 2018.

Our Code of Conduct was most recently updated in June 2018. It sets forth our commitments to fair employment practices and promoting respect for human rights within our supply chain. We require all employees to acknowledge and adhere to the commitments in our Code of Conduct and strive to do business only with suppliers who will uphold them and comply with all applicable laws and standards relating to human rights.

Our Code of Conduct provides guidance on our prohibitions of employment discrimination, trafficking in persons and forced, compulsory and child labor within our organization. In the context of combatting modern slavery and human trafficking, our Code of Conduct also stipulates that Comcast will not accept the following from any of our suppliers:

- The use of forced labor;
- The use of prison or indentured labor;
- The employment of workers younger than what is required by applicable laws or, under any circumstances, younger than the age of 16;

¹Comcast Corporation acquired Sky plc on September 24, 2018.

- The failure to observe applicable laws and regulations governing wage and hours/days of service or overtime payment; or
- The failure to provide workers with a workplace that meets applicable health and safety standards.

Over the past year, we have been working towards including in our supplier agreements provisions requiring from suppliers, legally binding assurances of compliance with applicable laws and regulations in connection with their work for Comcast, including those relating to modern slavery and human trafficking.

NBCUniversal has also in the past year continued to operate its Global Brand Standards factory audit program covering the manufacturing of NBCUniversal's branded products. Risks are assessed against a number of factors including the country in which products are manufactured. The program has a range of tools which are deployed proportionate to risk. NBCUniversal is working towards the goal of having all relevant suppliers managed by the factory audit program. As part of the program, NBCUniversal is conducting environmental, health and safety and labor audits and validating compliance with international labor standards, human rights and environmental practices. The audits examine compliance in areas including child labor, forced labor, hiring practices, working hours, health and safety, hygiene, food and housing and the environment. In the past year, additional compliance 'spot checks' have been added to the toolkit used to deliver the program. Training is provided to purchasing teams on the aims of the program and how to operate it effectively. NBCUniversal works closely with its manufacturing partners to increase their capacity for sustainable growth and take an active role in improving their labor, health and safety and environmental performance.

Our employees around the world can promptly report integrity concerns, including those relating to suspected human rights issues in our business or in its supply chain, through our Comcast NBCUniversal Listens program. Comcast NBCUniversal Listens offers employees a number of communication channels for raising concerns without fear of retaliation, including a 24-hour Helpline and Web Portal which are both administered by an independent third-party company, and allows an employee to remain anonymous where allowed by local law. Employees and their managers are trained on how to use these resources and the importance of speaking up to raise concerns. The Helpline and Web Portal are also available to accept reports from our business partners and other external parties.

The term "Comcast" as used in this Statement refers collectively to Comcast Corporation's Comcast Cable and NBCUniversal subsidiaries, including Comcast Cable Communications, LLC, NBCUniversal, LLC, and Freewheel Media, Inc.

This Statement on Supply Chain Values has been signed by the undersigned director for and on behalf of each of Comcast Cable Communications, LLC, NBCUniversal LLC, and Freewheel Media, Inc. insofar as this Statement relates to the activities of those respective entities or their subsidiaries.



Thomas J. Reid
Director

Date: June 19, 2019