



Statement on Modern Slavery and Supply Chain Values

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OUR APPROACH

Comcast is committed to upholding human rights and to acting honestly and with integrity in everything we do. As set forth in our [Human Rights Statement](#), we respect and support the principles of the United Nations' Universal Declaration on Human Rights. We commit to addressing the risks of modern slavery, forced labor, child labor, and human trafficking in our own business and our supply chains. This is consistent with our core business philosophy and values, which are outlined in our [Code of Conduct](#) and [Code of Conduct for Suppliers and Business Partners](#).

Our approach to preventing modern slavery, including human rights violations and labor exploitation, reflects the diversity of our business. Comcast business units employ varying controls and due diligence efforts to understand and mitigate the risks of modern slavery on a risk-based approach. As our understanding of the risk evolves, so does our approach.

In this Statement, we explain the steps taken within Comcast to identify and address modern slavery and labor exploitation in our businesses and supply chains in our last fiscal year, January 1, 2024 – December 31, 2024. The term “Comcast” as used in this Statement refers collectively to Comcast Corporation and its subsidiaries, including Comcast Cable Communications, LLC, NBCUniversal Media LLC, and Sky Limited as far as this Statement relates to the activities of those respective entities or their subsidiaries.

OUR STRUCTURE, BUSINESSES, AND SUPPLY CHAINS

Comcast is a global media and technology company that reaches customers, viewers, and guests worldwide through the connectivity and platforms services we provide and the content and experiences we create. We deliver broadband, wireless, video, and voice services primarily under the Xfinity, Comcast Business, Sky, and NOW brands; produce, distribute, and stream leading entertainment, sports, and news through brands including NBC, Telemundo, Universal, Peacock, and Sky; and own and operate Universal theme parks.

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We operate two primary businesses:

- **Connectivity & Platforms:** Contains our broadband, wireless, video and wireline voice businesses in the United States, United Kingdom and Italy (collectively, the “Connectivity & Platforms markets”). Also includes the operations of our Sky-branded entertainment television networks in the United Kingdom and Italy. Our Connectivity & Platforms business is reported in two segments, Residential Connectivity & Platforms and Business Services Connectivity.
- **Content & Experiences:** Contains our media and entertainment businesses that produce and distribute entertainment, sports, news, and other content for global audiences and that own and operate theme parks and attractions in the United States and Asia. Our Content & Experiences business is reported in three segments: Media, Studios and Theme Parks.

Connectivity & Platforms includes all of Comcast Cable and Sky’s connectivity businesses while Content & Experiences primarily encompasses NBCUniversal and Sky Sports.

Universal Destinations & Experiences, a division of NBCUniversal, owns and operates theme parks and resorts in the United States and Japan and owns a minority interest in the joint venture that owns and operates Universal Beijing Resort, which has its own Head of Compliance. Universal Studios Singapore is owned and operated by a third-party company, which licenses Universal intellectual property.

OUR POLICIES AND CONTROLS

Our policies set forth our guiding principles and communicate our values both internally to employees and externally to our business partners and other stakeholders. These policies, and the trainings that reinforce them, establish that Comcast employees and our business partners strive to operate with integrity and in compliance with applicable laws wherever we do business.

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Comcast Code of Conduct

Our [Code of Conduct](#) provides the framework for what we stand for and how we operate. It defines our principles of business conduct and reflects our shared commitment to integrity. We live our core values by conducting ourselves in a way that maintains trust and respect around the globe.

The Code of Conduct reaffirms our commitment to fair employment practices and promoting respect for human rights within our businesses and supply chains. Our Code of Conduct requires all employees to strive to do business only with suppliers who will uphold the commitments of our Code of Conduct and comply with all applicable laws and global standards relating to human rights.

Comcast Code of Conduct for Suppliers and Business Partners

Our [Code of Conduct for Suppliers and Business Partners](#) (“Supplier Code”) sets the standards applicable to our suppliers and business partners across the enterprise and codifies our expectation that

suppliers and business partners act ethically and comply with applicable laws and regulations in connection with their provision of products, services, or staffing to or for our Company. Our business units require resources from around the world, and as such, we partner with suppliers and manufacturers spanning the Americas, Asia, Australasia, Europe, and Africa.

Our Supplier Code sets forth our expectations of suppliers and business partners to treat people fairly and with respect and to provide all workers with a safe, secure, and healthy working environment. Our Supplier Code also incorporates several International Labour Organization (“ILO”) Conventions including prohibitions on discrimination and harassment, prevention of forced labor and human trafficking, prevention of underage labor, freedom of association, and the establishment of wage and benefits standards such as no recruitment fees or costs charged to workers. Additionally, while Comcast does not directly purchase raw minerals, we encourage our suppliers to avoid the use of conflict minerals in the manufacture of products and to engage in appropriate due diligence, as set forth in our [Conflict Minerals Policy Statement](#).

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As noted in last year's statement, we continued to advance our Responsible Procurement program in 2024 along with our supplier due diligence campaign. We communicated directly with our suppliers and business partners across our global ecosystem about our Supplier Code and our expectation that they, their workers, and their subcontractors conduct business in a manner consistent with our [Human Rights Statement](#) and in accordance with applicable labor and employment laws and regulations. Our business units also embedded the Supplier Code in vendor service agreements and require adherence.

Business Unit Policies

In addition to our enterprise Code of Conduct and Supplier Code, we have business unit policies relevant to human rights and labor exploitation. Each business unit maintains a Human Rights Policy based on the International Bill of Human Rights and UN Guiding Principles on Business and Human Rights. The policies reaffirm Comcast's commitment to preventing human rights violations and labor exploitation. They make clear that exploitative practices will not be tolerated in Comcast's business operations or supply chains

and remind employees where they can report concerns.

Each business unit maintains a policy relating to the use of Conflicts Minerals in manufactured products. Those policies set forth Comcast's expectations for relevant suppliers regarding the responsible sourcing of products containing tin, tantalum, tungsten and gold along with the due diligence framework for manufacturing and design of products containing those minerals.

Sky also published its [Declaration of Principles on Human Rights and the Environment](#) in alignment with the German Supply Chain Act. In it, Sky outlines its commitments and risk assessment and management approaches and processes, which build on Sky's overall approach to meeting growing regulatory requirements.

Training

Central to our enterprise training program is our Code of Conduct. Our employees are required to acknowledge the Code of Conduct annually and receive training on our Code of Conduct on a biennial basis. Our enterprise Anti-Bribery and Anti-Corruption course also

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provides guidance to employees on how to identify “red flags,” several of which are also indicators of risk for modern slavery and labor exploitation. Individual business units continue to develop guidance for suppliers on ethical relationships and modern slavery tailored to their business needs.

In 2024, NBCUniversal, and Sky administered trainings focusing on human rights due diligence, conflict minerals, and modern slavery including prevention and mitigation measures. Trainings were delivered to employees, procurement professionals, business partners and key suppliers, through multiple resources, including in-person legal teams, worker survey partners, and through our memberships in the Unseen Business Hub, the Responsible Business Alliance (“RBA”), and the TV Industry Human Rights Forum.

Sky also completed onsite one-on-one training to six core Electronic Manufacturing Services partners on minimum due diligence standards, effective worker surveys, risk assessment, and remediation of issues. The training helped suppliers prepare for

their obligations under the Corporate Sustainability Due Diligence Directive and build capacity to manage their own approved vendor lists in line with RBA and Sky requirements.

Risk Assessments

Risk assessments are a critical component of our enterprise risk management and business unit compliance programs. Our compliance risk management program specifically requires each business unit to assess the risk of modern slavery in their businesses and the controls in place to ensure adequate actions are being taken to prevent such risks. Our risk management program also focuses on risks in other areas pertinent to modern slavery, including anti-corruption and sanctions/international trade controls.

Comcast Cable’s 2024 modern slavery risk assessment continued to focus on the Cable business’ third-party manufacturing supplier relationships located outside of the United States. The review assessed Comcast Cable’s governance structure supported by its public commitments and expectations that employees adhere to

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the principles outlined in our Code of Conduct, our Human Rights Statement, and Comcast Cable's internal policies including its Human Rights and Conflict Minerals Policies. Both the public statements and internal policies reaffirm Comcast Cable's commitment to fair employment practices and promoting respect for human rights within its business and supply chains. This is further evidenced by Comcast Cable's participation in EcoVadis and securing a bronze medal. Comcast Cable continues to utilize RBA resources, including verified audits, to support its compliance efforts. The risk assessment also confirmed that Comcast Cable's communications practices with our key suppliers include supplier outreach to participate in or share their EcoVadis assessment scores.

NBCUniversal refreshed its compliance risk management assessment and will continue to focus future assessments on areas including labor exploitation, modern slavery, human rights, and international trade controls.

Sky continues to conduct its annual human rights and modern slavery risk assessment for operations in the UK, Germany, and Italy. After its 2024 review, Sky's supplier risk assessment was updated to include enhanced reviews of human rights, working conditions, and other modern slavery considerations based on category and country risk levels. The organizational and supply chain risk registers inform the Sky risk management process. The process is overseen by Sky Group Risk, Sky's Compliance team and Sky's Governance Committee, all of which review human rights risks and risk management annually and on an ad hoc basis.

Raising Concerns

Our employees, suppliers, and business partners around the world are encouraged to report suspected illegal or unethical conduct, including suspected human rights issues in our businesses or our supply chains, through our [Comcast NBCUniversal Listens and Sky Listens](#) programs. Our programs provide several channels for speaking up without fear of retaliation, including a helpline and web portal that are administered by an independent third-party company. A violation of the Code of Conduct or a Company policy

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may result in disciplinary action for our employees, including but not limited to termination of employment, impact to compensation, or other appropriate action, regardless of an employee's title or tenure. Our Code of Conduct prohibits retaliation against those who in good faith raise a concern or participate in the investigation of suspected illegal or unethical conduct.

Our Comcast NBCUniversal Listens and Sky Listens web portal is available in 19 languages and dialects and publicized in our Code of Conduct and Supplier Code, both of which are available on our corporate website. Comcast consistently monitors employee headcount and opens the hotline and web portal in countries or regions where employees require access to speak up channels. Our speak up program is supported by dedicated professionals who investigate allegations or concerns raised through the web portal or hotline. Employee engagement surveys provide an additional forum for employees to raise issues and express concerns. As shown in those surveys, our employees are aware of how to report ethical concerns or observed misconduct and believe they can report such matters without fear of retaliation.

In 2024, Comcast reviewed its Enterprise EU Whistleblower Directive Policy and renewed guidance to local HR professionals regarding complaint handling and escalation procedures pursuant to the EU Whistleblower Directive.

OUR ACTIONS

Comcast has adopted various approaches to protect workers from modern slavery and labor exploitation in our businesses and in our supply chains. When dealing with third parties, we seek to work with those who are legitimate and reputable, qualified to perform the services for which they are engaged, and share Comcast's commitment to complying with the law and adhering to the standards of business conduct set forth in our Supplier Code. We maintain risk-based due diligence procedures that vary by business to achieve this objective. Comcast continues to update its diligence efforts and processes in conjunction with new U.S. importation legislation linked to anti-forced labor initiatives.

In 2024, Comcast Cable continued to conduct due diligence on its third-party suppliers, including screening for potential sanctions,

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international trade issues, modern slavery and human trafficking, and reputational concerns. Comcast Cable conducted diligence on approximately 800 third-party suppliers. If a concern with respect to a supplier is raised or identified, Comcast Cable investigates the concern and, where appropriate, in cooperation with the supplier, establishes a corrective action plan to ensure remediation.

At NBCUniversal, as noted in prior statements, among the higher-risk areas of the business are consumer products licensing which involves third-party factory production, the operations of the parks through Universal Destinations & Experiences, and the use of outsourced labor to support various aspects of NBCUniversal's business. The risks in these areas are managed through a combination of controls, including due diligence, in-person training, and periodic auditing.

The Universal Destinations & Experiences division of NBCUniversal owns and operates theme parks and resorts in the United States and Japan and owns a minority interest in the joint venture that owns and operates Universal Beijing Resort, which has its own

Head of Compliance. Universal Studios Singapore is owned and operated by a third-party company, which licenses Universal intellectual property. Each wholly owned and operated park is located in a geographic region with a high level of government enforcement of labor laws and regulations. Each park has its own Human Resources department and tracks team member working hours to ensure overtime is accurately paid. Further, each park has an Environmental, Health, and Safety department that is dedicated to maintaining a safe working environment, and an on-site Health Services department. Third-party restaurants and retail stores permitted to operate within the parks are required to adhere to all local labor laws and standards prohibiting modern slavery, as a condition of the contract.

In 2024 Universal Destinations & Experiences continued the construction of two new U.S. projects, one in Texas and one in Nevada. Similar to restaurants and retail stores, where Universal Destinations & Experiences outsources construction activities to third parties, adherence to health and safety and labor laws are conditions of the contract, and all such third parties are subject to

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appropriate due diligence. Subcontracted workers engaged on Universal Destinations & Experiences projects are informed how to raise concerns to NBCUniversal via our Comcast NBCUniversal Listens speak up channels.

NBCUniversal also continued its third-party factory auditing program under NBCUniversal's Global Brand Standards policy. NBCUniversal businesses and their agents request approval before third-party factories produce and distribute NBCUniversal-themed merchandise. NBCUniversal audited and spot-checked 1,554 factories prior to approval for use in 2024, compared to 1,695 in 2023. Most of the audit findings were mitigated by working with the factories to improve standards and conditions prior to authorizing production of themed products. No instances of forced labor were identified in audited or spot-checked factories in 2024.

Sky continued to implement human rights due diligence where the greatest risks were present and completed corrective actions identified through this process. In addition to refreshing its annual human rights risk assessment for suppliers, Sky completed

additional in-depth assessments for Consumer Product Equipment ("CPE") and logistics, accounting for risks present given the nature of work, type of employment, and suppliers' prior audit history.

In 2024, Sky audited 96 suppliers across 14 countries, compared to 129 suppliers audited in 2023. Through the audit program and Sky's Group Supply Chain and Sustainability team visits, indicators of forced labor were identified at three supplier sites supplying components to CPE suppliers (Tier 2). These issues included recruitment fees paid by workers at the site, who were sourced and managed via recruitment agents. In response, Sky initiated an investigation and engaged suppliers to agree on a plan to repay workers who were subjected to recruitment fees. While improvements and collaborative remediation are always pursued first, a lack of willingness to engage from suppliers resulted in a discontinuation of engagement with two suppliers. The engagement continues with the third supplier.

Also, in 2024, Sky conducted a comprehensive risk assessment of its warehousing and logistics providers across Europe. The

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assessment enabled Sky to identify suppliers requiring enhanced due diligence. Following the assessment, Sky initiated a series of third-party and internal audits, along with social and environmental evaluations utilizing newly released RBA methodology focused on warehouses, with ten prioritized suppliers. Following each assessment, Sky has engaged its suppliers implementing corrective action plans including regular follow-up meetings and visits to monitor progress. In addition to site-specific actions, Sky analyzed common trends across its operations and collaborated with non-profit organizations to develop training materials for key stakeholders, including warehouse management, workers and Sky's logistics team.

Sky also launched its supplier Sustainability Guidance Standard for consumer products and equipment, defining mandatory and strategic requirements for suppliers and aligning these requirements through tendering and onboarding processes. With this standard, Sky has engaged its direct CPE suppliers on enhancing their due diligence standards and systems. As a result, the suppliers have improved their risk assessment and risk

management capabilities including management of their own approved vendor lists in line with RBA and Sky requirements.

In 2024, Sky continued to develop its approach to preventing labor exploitation through responsible construction practices. Following learnings from construction of the Sky Innovation Centre and Sky Studios, Sky developed an approach to smaller scale projects with three pilots in 2024. The pilots informed Sky's new construction toolkit, which incorporates modern slavery and ethical labor practices, applies human rights due diligence on tier 1 contractors, uses workforce engagement and data to monitor risk, and will support contractor performance management. Sky also conducted supplier engagement on renewable energy, including traceability and human rights due diligence, including an RBA audit to support risk-based decision making and improvements within the solar supply chain.

As members of the Responsible Minerals Initiative, all Comcast business units use the Conflict Minerals Reporting Template process to develop greater transparency and identify where higher

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risks may exist within their supply chains. Suppliers are expected to annually disclose, on a confidential basis, updated smelter/refinery information for any tin, tantalum, tungsten, or gold (3TG) used in the production of parts, materials, components and products. Sky's supplier outreach also includes the Extended Minerals Reporting Template, which requests disclosure of any cobalt and mica in addition to 3TG.

OUR INDUSTRY EFFORTS

Comcast seeks to collaborate with industry peers and NGOs to improve and enhance its processes and promote industry-wide improvements. In 2024, Comcast Corporation, through its RBA membership, continued its commitment to supporting continuous improvements in the social, environmental, and ethical responsibility of its supply chains.

NBCUniversal and Sky are both founding members of the TV Industry Human Rights Forum. Through the Forum, NBCUniversal and Sky commission research and industry events into labor practices on TV productions, with a particular focus on ancillary

workers such as those providing cleaning, catering, security, transport, facilities, and construction services on production sets. The research involves a combination of desktop research, site visits, interviews with production teams, and direct engagement with workers. Along with other industry peers, NBCUniversal and Sky continue to support the development and piloting of tools, such as procurement checks, to improve working conditions for content production workers. All research and toolkit output from the forum is published and made freely available for use by others in the industry. This year, the Forum research focused on the production value chain stage of post-production, engaging ancillary workers in the industry to better inform due diligence and a focus on climate and human rights.

Both Sky and NBCUniversal sit on the Advisory Council of the Centre for Sports Human Rights, a not-for-profit organization headquartered in Geneva, Switzerland, established to embed human rights values into the sports industry, including major sporting events such as the World Cup and Olympics, as well as one-off sporting events. Sky remains a member of the Responsible

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Media Forum, a group convened to discuss and agree on responsible business practices in the media industry, including those which relate to human rights and modern slavery.

NBCUniversal renewed its membership in SPLICE, the “Society of Product Licensors Committed to Excellence,” a trade association established to share best practices amongst brand licensors in relevant areas including social responsibility and respecting human rights.

Comcast Corporation recognizes that NGOs and charitable organizations have a key role to play in raising the profile of modern slavery risks and helping to support victims. Sky and NBCUniversal remain members of the Unseen Business Hub cementing their long-term relationship with an organization that provides critical support services for victims of modern slavery. They also continue to support the UK Modern Slavery Helpline, which is run by the Unseen Business Hub.

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2024 CASE STUDY

In 2023, Sky began engaging an electronic manufacturing service based in the Philippines to enhance its own human rights management systems as a part its Supplier Management Training program.

The engagement continued through 2024 with Sky providing bi-monthly in person support and training while the supplier built its human rights management systems. Sky also partnered with the supplier to provide the tools needed to manage their risks, build capabilities in its supply chain and otherwise improve its processes.

Through this partnership, the supplier has become an RBA member, arranged RBA audits at its high-risk suppliers, and enhanced its own audit program to include social and ethical measures across its supply chain.

In addition to developing policies, procedures and clear standards, the supplier has established a dedicated team responsible for conducting risk assessments and to implement corrective actions and improvements, with necessary support and advice where needed. The supplier now provides monthly reports on corrective action progress.

Sky continues to collaborate with its key manufacturing suppliers who remain important partners in implementing effective modern slavery and human rights due diligence efforts.

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

Elizabeth Wideman

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Director

June 18, 2025