

Conflict Minerals Policy Statement

Sky respects the rights and wellbeing of everyone we impact through our activities. Our approach to the key human rights of workers is set out in our Code of Conduct for Suppliers and Business Partners which we share with our parent company, Comcast, and further underpinned by our <u>Human Rights Policy Statement</u>.

Sky produces and sells electronics, which contain mined metals key to many electronics industry technologies. This makes us an end user and customer, via component producers and final product assembly in our supply chain, of metals such as tantalum, tin, tungsten and gold which may be sourced from conflict-affected and high-risk areas.

This policy sets out our approach to conflict-sensitive sourcing practices and risk awareness for these raw materials, and the standards that we expect our suppliers to adhere to at all times. For the purpose of this Policy, "supplier" refers to any company that has contracted (or is intending to contract) with Sky to supply components or products used in the manufacture or assembly of Sky-branded products from set top boxes, hubs and accessories to our satellite dishes and any new products.

1.1 Our approach

We recognise the significant adverse impacts which can be associated with extracting, trading, handling and exporting minerals from conflict-affected and high-risk areas. As an end user of these products, we have a responsibility to protect human rights through our mineral and metal supply chain due diligence and not contribute to conflict.

Our approach to responsible sourcing within our minerals supply chain is based on the Organisation for Economic Co-Operation and Development's (OECD) Due Diligence Guidance for Responsible Supply Chains of Minerals from Conflict-Affected and High-Risk Areas. Through our membership of the Responsible Business Alliance we are committed to a common Code of Conduct, supporting and collaborating on key human rights of workers and communities worldwide affected by the global electronics supply chain. We are also members of the Responsible Minerals Initiative, which provides tools and resources to help companies verify that sourcing practices are in line with the OECD framework.

As detailed in our <u>Human Rights Policy Statement</u>, our due diligence includes policies, risk assessments, integrating effective action, monitoring, communications and grievance mechanisms to ensure we use tin, tantalum, tungsten and gold from responsibly managed sources including those in conflict affected and high risk areas.

1.2 We expect our suppliers to:

- Establish and maintain a publicly available policy on responsible minerals sourcing in line with the OECD's guidance.
- Establish due diligence frameworks and management systems consistent with the OECD Guidance, including independent third-party audits of smelters in their supply chain.

And through our Code of Conduct for Suppliers and Business partners and contractual agreements:
Comply with the Responsible Business Alliance (RBA) Code of Conduct and this policy

- Extend these expectations to their own suppliers due diligence practices.
- Disclose to Sky yearly (on a confidential basis) updated smelter/refiner information for any tin, tantalum, tungsten or gold used in the production of our parts, materials, components and products.

1.3 We commit to:

- Exercise due diligence with suppliers of Sky-branded products in line with the OECD Guidance
- Provide, and require our suppliers to provide, due diligence information confirming that tantalum, tin, tungsten and gold are responsibly sourced
- Provide training to our suppliers on identifying risks, due diligence, and the means to promote increased transparency
- Carry out independent third-party audit of supply chain due diligence at identified points in the supply chain
- Report findings of our supply chain risk assessment to the designated senior management of the company
- Adhere to a robust risk management strategy which is consistent with Annex II of the OECD Guidance
- As members, work with the Responsible Minerals Initiative (RMI) to map supply chains and validate smelters and refiners.
- Ensure effective grievance mechanisms as an early-warning-risk-awareness system for people to raise concerns, as detailed in our Code of Conduct.
- Report annually on our supply chain due diligence via our UN Global Compact Communication on Progress in the form of our <u>Impact Report</u>.

Sky's Group Exec oversee Sky's strategic responsibility and sustainability approach, policies and related commitments. The Group Supply Chain Director has responsibility for the implementation and review of the Conflict Minerals policy.

Sky will engage with suppliers and industry bodies as appropriate to support any necessary improvements and encourage long-term solutions to enable responsible sourcing.

