

# Whistleblowing policy (Sky Group)

[English \(Original\)](#)

Last Reviewed Date 01/04/2022 Next Review Date 31/03/2023 Restricted

---

This policy sets out a simple and effective way for our people including externals to speak up about questions or concerns regarding a workplace issue or suspected illegal or unethical conduct or any concerns related to the business activities and relationships of Sky, e.g. working conditions, human rights and environmental impacts, illegal or any other unethical conduct. The whistleblowing channel it describes can also be used by customers, suppliers, business partners or other third parties to raise a complaint to Sky.

- To **print** this document, either right click on the page and select 'Print', or press 'Control' and 'P' if you're using a Windows device, or, 'Command' and 'P' if you're using a Mac, and select your printer.
- To **download**, either right click on the page and select 'Print', or press 'Control' and 'P' if you're using a Windows device, or, 'Command' and 'P' if you're using a Mac, and select 'Save as PDF' instead of your printer.

## Table of Contents

[1.0 Purpose](#)

[2.0 Applicable To](#)

[3.0 Principles](#)

[4.0 Speaking Up](#)

[4.1 What should be Reported](#)

[4.2 Managers' Responsibilities](#)

[4.3 How to Raise a Concern](#)

[4.4 What Sky Does with Reports](#)

[4.5 Retaliation, Confidentiality, and Escalation](#)

[4.6 External Disclosure & Advice](#)

[5.0 Exceptions to this Policy](#)

[6.0 Consequences of Breaching this Policy](#)

[7.0 Reporting Breaches or Concerns](#)

[8.0 Changes to this Policy](#)

[9.0 Monitoring and Review of this Policy](#)

[10.0 Points of Contact](#)

[11.0 Policy Owner](#)

## [12.0 Appendices](#)

### [Appendix A - Definitions and Explanatory Notes](#)

#### [External links](#)

---

## 1.0 Purpose

Sky, including its operating businesses and Controlled Subsidiaries world-wide (collectively “**we**”, “**us**”, “**our**”, “**Sky**” or “**Company**”) is committed to doing the right thing, and acting with integrity and the highest ethical standards, in all our business dealings and relationships around the world and we expect the same of our people.

This policy (“**Policy**”) supports the **Comcast Corporation Code of Conduct** and sets out a simple and effective way for employees and externals to speak up about questions or concerns regarding a workplace issue or suspected illegal or unethical conduct. It serves to facilitate reporting, encourage responsible individual conduct, and alert the business to potential problems without fear of retaliation.

The principles, requirements and procedures covered in this Policy comply with applicable laws and regulations in respect of whistleblowing. These include the U.K. Employment Rights Act 1996, the U.K. Public Interest Disclosure Act 1998, the Italian 179/2017 Law, the Italian Legislative Decree 231/2001, The Irish Protected Disclosure Act 2014, Portuguese Law No. 93/2021, German Supply Chain law (LkSG) and related laws and regulations in other countries in which we operate, as amended from time to time (collectively “**Whistleblowing laws**”).

Compliance with this Policy helps protect Sky, Comcast and our people from potential breaches of laws and regulatory, financial, or reputational risks.

## 2.0 Applicable To

This Policy applies to all Company Employees, whether permanent or temporary, wherever located (“**you**” or “**employee**” or “**Sky people including externals**”).

## 3.0 Principles

Sky is committed to conducting our business fairly, with respect, honesty and integrity and we expect all Sky people to maintain high standards of ethical behaviour and transparency and to raise any Complaints as early as possible.

This Policy explains how you can raise concerns responsibly if you have reasonable grounds for suspecting malpractice or business misconduct including, but not limited to, any of the situations mentioned in the ‘What should be Reported’ section below. This Policy also explains how to take the matter further if you are dissatisfied with Sky’s response.

Sky does not tolerate harassment or victimisation of any person raising issues in good faith, even if they turn out to be mistaken.

This Policy is not intended to address the Company’s processes for handling concerns about illegal or unethical conduct that may be brought to its attention as a result of litigation, a government investigation, or similar legal action brought against the Company.

## 4.0 Speaking Up

In order to support a broad culture of open communication and reporting, Sky has created the **Sky Listens** Programme to support the Sky Listens Programme. This provides several available channels to raise a concern and gives everyone a wide range of ways to let Sky know about your concern.

You're encouraged to speak up by using the channel or option that you feel most comfortable with, all of which are set out in section 4.3 below. Whichever method you choose please do consider raising your concern at the earliest possible stage.

Unless required by local law, Sky doesn't require you to reveal your identity and we have a confidential Helpline and Web Portal that means you can make a report whilst not revealing who you are. In some countries HR are also be able to receive anonymous reports by phone. Anyone may submit a report via the Helpline or Web Portal and the details of this are available publicly in the Comcast Code of Conduct.

### 4.1 What should be Reported

A concern may relate to a worry, suspicion or knowledge about wrongdoing that has taken place, is taking place or is likely to take place within Sky, or which is happening outside Sky but may impact us. Examples include:

**4.1.1 Workplace Issue:** Any allegation or concern that relates to an employee's day-to-day **workplace experience** such as;

- (a) unfair treatment,
- (b) concerns about work allocation,
- (c) personality clashes with a co- worker or manager,
- (d) scheduling conflicts, or
- (e) favouritism.

**4.1.2 Fair Employment Issue:** Any allegation or concern of suspected illegal or unethical conduct that asserts a breach of the **Treat People Fairly and with Respect** principles set out in the Comcast Code of Conduct, or any related Sky policy, by Sky, or an Employee, or Third-Party representative of the Company, such as:

- (a) discrimination, harassment, or hostile work environment as defined in Sky's people policies (e.g., race, gender, age, religion, disability, national origin)
- (b) a violation of an applicable labour or employment law or regulation;

**4.1.3 Integrity Issue:** Any other allegation or concern of **suspected illegal or unethical conduct**, by Sky, an Employee, or Third-Party representative of the Company such as;

- (a) an assertion of a breach of the Code of Conduct
- (b) accounting, internal accounting controls or auditing matters;
- (c) bribery, corruption, or kickbacks;
- (d) fraud; falsification of travel and entertainment expenses;
- (e) falsification of customer numbers or metrics;
- (f) conflicts of interest;

- (g) disclosure of proprietary or personally identifiable information;
- (h) misuse or theft of Company assets;
- (i) sale of illegal drugs; violent acts or threats to personal safety;
- (j) conditions that pose a danger or hazard to an Employee, customer, facility, or the general public;
- (k) Public procurement;
- (l) Financial services, products and markets and prevention of money laundering
- (m) Product safety and compliance
- (n) Transport safety
- (o) Protection of the environment
- (p) Radiation protection and nuclear safety
- (q) Food and feed safety, animal health and welfare
- (r) Public health
- (s) Consumer protection
- (t) Protection of privacy and personal data, and security of information systems and networks.; or
- (u) human rights concerns.

**4.1.4 Retaliation:** Any allegation or concern of **retaliation** that arises from having raised a concern or having provided information to the Company.

Certain jurisdictions may impose specific obligations on individuals to report to the police any information which they know or believe might be of material assistance in:

- (a) preventing the commission by any other person of a relevant offence; or
- (b) securing the apprehension, prosecution or conviction of any other person for a relevant offence, to disclose that information as soon as is practicable to do so to the local police force;

and to disclose any such information to the local police force as soon as it is reasonably practicable do so.

## **4.2 Managers' Responsibilities**

We expect all employees, including managers, to cooperate fully and honestly in Company investigations of any kind so that we can get to the bottom of the issue and address it as needed. Some concerns may require an in-depth investigation (including by a specialist), which could include meetings with witnesses or others involved, and collecting documents. As an employee or a manager of an employee involved in an investigation, you could be asked to help with this; and if you are, we expect you to keep this confidential.

As people leaders within the organization, a manager has additional responsibilities in support of this Policy and a culture that embeds our Code. Managers must set the right example and serve as role models for their teams and all employees. It is crucial that you foster an open reporting environment that encourages employees to ask questions, raise concerns, and speak up.

When managers receive or are aware of a concern from one of their employees, they must respond as follows:

- For a **workplace issue** (as defined above), you must keep it confidential, take immediate impartial action to understand and resolve the issue, document your approach and the outcome [and provide this to your HR business partner.] If you are in doubt about how to do this, you should contact your HR business partner for assistance.
- For a **'fair employment'** issue or an **'integrity issue'** (as defined above)) you must immediately report it to your HR business partner; or if that is not possible for any reason, Employee Relations or your local Compliance team. Managers should never investigate these issues themselves. If these issues come up during your resolution of a 'workplace' issue, you must report it immediately.
- Regardless of the concern raised, managers must never engage in any form of **retaliation** and you must reinforce this with anyone you deal with in the course of an investigation. You must report any actual retaliation or allegation of retaliation by others immediately as an 'integrity issue'.

#### 4.3 How to Raise a Concern

Sky people can raise questions or concerns by contacting:

- (a) your manager,
- (b) your local HR, Security, or Legal (including Compliance) contact; or
- (c) Your local Works Council
- (d) the Sky Listens confidential Helpline or
- (e) the Sky Listens confidential Web Portal.

The Confidential Helpline and Web Portal can also be used by customers, suppliers, business partners or other third parties if they have a concern about potential illegal or unethical conduct in connection with their relationship with us or any other aspect of our business.

While anyone can use the Helpline and Web Portal, some workers (under 45(1) TFEU) or other third parties who are not Sky employees have additional rights under local Whistleblowing Laws when raising a complaint. For more information on your rights please see section 4.6 of this Policy.

Both the Confidential Helpline numbers and the Web Portal can be found at [www.ComcastSkyListens.com](http://www.ComcastSkyListens.com). There are options for 'Make a report by phone' and 'Make a report online' (which includes being able to do it in your own language).

The Sky Listens Programme is part of the broader Sky Listens Programme and includes a Confidential Helpline and Web Portal administered by NAVEX Global, Inc. ("**Navex**"), an independent third party.

The Comcast Corporation Audit Committee has also established a process for Employees to communicate with its members. If you have a concern you may send an email to: [Audit\\_Committee\\_Chair@comcast.com](mailto: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, visit the [Contact the Board](#) section of the Comcast Corporation website.

Sky People should raise suspicions of money laundering to Sky's Nominated Officer and refer data protection concerns to your local Data Protection Officer. Anyone else can raise concerns about these areas and others through the Helpline or Web Portal,

## **4.4 What Sky Does with Reports**

### **4.4.1 What happens after I file a report?**

It is Sky's policy that whistleblowing reports be acknowledged with the reporter within seven (7) days of receipt and are reviewed by staff independently responsible for assessing and handling confidential whistleblowing reports. We'll determine the need for and scope of any investigation.

In some cases, Sky may appoint an investigator (internal or external) or team of investigators with relevant experience to identify the facts regarding any potential breaches. The investigator(s) may also make recommendations, including findings on the conduct of individual persons, which may result in referral to the formal conduct processes applicable in each country in which we operate. The investigator may also recommend other changes to enable us to mitigate the risk of future wrongdoing, such as policy enhancements, for example.

### **4.4.2 Will I be told the outcome?**

If you've provided your contact information or used the Helpline or Web Portal, we'll keep you informed of the main progress of the investigation and its likely timescale and will provide feedback where we can in accordance with the law while maintaining the integrity of the investigation. The need for us to complete an investigation impartially, confidentially and in a way that treats our employees fairly may prevent us giving you specific details of the investigation or any disciplinary action taken as a result. You would not normally be given details of specific disciplinary action taken against other individuals. Where we can provide you with feedback, you should always treat any information about the investigation as confidential.

If you have chosen to remain anonymous, the Confidential Helpline and Web Portal provide a direct channel through which Sky can communicate with you whilst maintaining your anonymity. However, this can make it more difficult to investigate any concern raised because we may be unable to fully discuss your concerns with you or obtain further information. Sky encourages you to identify yourself where you can, but if you choose not to, we will not make any attempt to find out who you are.

Where a crime or other serious event has been reported, the person suspected remains innocent until and unless proven otherwise (for example, where they plead guilty to an offence). Nevertheless, appropriate decisions such as suspension may need to be taken to safeguard Sky people, our business, and third parties (including, but not limited to our Suppliers and Business Partners). Suspension does not mean that an allegation has been proven or infer guilt.

### **4.4.3 What support can I get?**

Sky understands that being involved in an investigation in any way can be stressful and unsettling. We are committed to minimising the impact on individuals by conducting timely, fair and impartial investigations and we look to provide appropriate support to individuals through the process.

If you feel you need support whilst an investigation is underway you can contact HR or your line manager who will provide you with personal support as part of their role. If you

need support in relation to the investigation itself, then you can discuss this with the Investigator. They may refer you to a more appropriate department or person to assist but will be able to provide advice before doing so. You should always ensure that anything related to the Investigation is kept confidential.

## **4.5 Retaliation, Confidentiality, and Escalation**

### **4.5.1 Retaliation**

Sky doesn't permit retaliation against any Reporter who in good faith raises a concern or participates in the handling or investigation of a concern whether it's about an actual or suspected concern (even if the concern is eventually unsubstantiated).

No-one should suffer any detrimental treatment because they raised a concern. We have provided some examples below for the types of things that may, if done because of making a report. The examples listed aren't exhaustive.

- a) suspension, lay-off, dismissal or equivalent measures.
- b) demotion or withholding of promotion.
- c) transfer of duties, changes of location of place of work, reduction in wages, change in working hours.
- d) withholding of training.
- e) a negative performance assessment or employment reference.
- f) imposition or administering of any disciplinary measure, reprimand, or other penalty, including a financial penalty.
- g) coercion, intimidation, harassment, or ostracism.
- h) discrimination, disadvantageous or unfair treatment.
- i) failure to convert a temporary employment contract into a permanent one, where the worker had legitimate expectations that he or she would be offered permanent employment.
- j) failure to renew, or early termination of, a temporary employment contract.
- k) harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income.
- l) blacklisting based on a sector or industry-wide informal or formal agreement, which may entail that the person will not, in the future, find employment in the sector or industry.
- m) early termination or cancellation of a contract for goods or services.
- n) cancellation of a license or permit; or
- o) psychiatric or medical referrals.

If you feel you've suffered adverse treatment or victimization because you spoke up, you should raise this as a **new concern**. You can do this using the channels mentioned in this Policy. Equally, you should raise a concern if you think someone else is being treated badly or being discriminated against due to concerns they previously raised. If you'd prefer you can do so anonymously via the Helpline and Portal.

### **4.5.2 Confidentiality**

Many concerns cover situations and events that are likely to have an impact on the wider public or have a public interest element and may be regarded as a “Protected Disclosure” by law. Local laws differentiate on how the establish protections for legally recognised whistleblowers, and these can be different in each territory we operate. Sometimes an issue you raise may not fall under the legal definition of ‘Whistleblowing’ in the territory concerned and the legal protections may not apply.

Sky’s policy is to treat people consistently in the way that it protects people. Sky seeks to ensure confidentiality is protected, in particular that reporters’ identities are protected in accordance with their wishes and that retaliation in any form is always prohibited.

If you do choose to identify yourself when making a report, or at any time later, we’ll keep this confidential wherever we can. In rare case this might not be possible: for example, we may be required by a court to disclose your identity during legal proceedings, or we may be concerned someone’s personal safety is at risk. We will do our best to discuss with you whether and how best to proceed in such cases.

#### **4.5.3 Escalation**

If you’re concerned Sky’s response to a Concern you have raised under this Policy wasn’t appropriate, you may escalate it to the Whistleblowing Champion Niall McGinnis (by any means including email) or to the Comcast Audit Committee. Your escalation will be investigated by someone independent of the original investigation into your concern.

#### **4.6 External Disclosure & Advice**

Sky’s expectation is that all participants in an investigation respect the confidentiality of the investigation and of Sky confidential data and information. We encourage you to raise your concern to Sky before contacting an external channel so that we can investigate and take appropriate action as soon as possible.

If you do wish to make a report to a relevant public regulator or authority you should ensure that this is in line with local legalisation. Please be aware that you may not be protected as a Whistleblower if you disclose confidential information outside of legally approved routes.

You can also contact the following external organisations for independent advice and guidance:

**UK: Protect** (Independent Whistleblowing Charity):

- Web: <https://protect-advice.org.uk/> (formerly known as Public Concern at Work).
- Helpline: 0203 117 2520
- E-mail: [whistle@protect-advice.org.uk](mailto:whistle@protect-advice.org.uk)

**EU: The European Citizen Action Service** (ECAS), at <https://ecas.org/> and its 'Europe Advice (YEA) service'.

#### **Global: Whistleblowing International**

**Network** at <https://whistleblowingnetwork.org> which brings together national and international non-profit organisations to defend and protect whistleblowers. The Members Section highlights local organisations who may be able to help.

### **5.0 Exceptions to this Policy**

Exceptions to this Policy are not permitted due to the severity of the consequences of not complying with this Policy for Sky and for you.

## 6.0 Consequences of Breaching this Policy

Failure to comply with this Policy (without an approved exception if applicable) may result in disciplinary action up to and including termination of employment.

## 7.0 Reporting Breaches or Concerns

We expect you to report any suspected or actual breaches of this Policy by contacting your line manager, another local leader, HR representative, Legal (including Compliance) contact, Sky Listens Helpline or Web Portal, Works Council, or other local channels set out in local policies. For more information on the available reporting channels go to [www.ComcastSkyListens.com](http://www.ComcastSkyListens.com). This may include for example where you're aware a colleague is raising a concern that is not in good faith.

Sky prohibits retaliation against any Sky employee who makes a good faith report of an actual or suspected breach of this Policy even if the concern is eventually unsubstantiated.

Nothing in this Policy or any other Sky policy limits your ability to communicate with or provide information to any competent authority, appropriate regulatory body, government official or agency or commission, including the U.S. Securities and Exchange Commission, Financial Conduct Authority or local equivalent regarding possible legal breaches without disclosure to Sky, as protected under international whistleblower laws

## 8.0 Changes to this Policy

Sky makes sure its policies are up to date and right for everyone at Sky. This Policy may change from time to time with or without notice.

The latest version of this Policy will be published on your local intranet and it is your responsibility to read, understand and comply with the requirements, procedures and other matters set out in the latest version of this Policy at all times.

## 9.0 Monitoring and Review of this Policy

The Policy Owner is responsible for reviewing and maintaining this Policy from time to time and for ensuring that appropriate governance and oversight controls and procedures are designed, implemented and monitored with local business owners, training is provided, and for management reporting as appropriate to mitigate the risks covered by this Policy.

## 10.0 Points of Contact

For enquiries about this Policy please contact your line manager, the Policy Owner, or your usual Legal or Compliance contact.

## 11.0 Policy Owner

Policy Owner: **Sky Group Security**

Sky's **Whistleblowing Champion** is Niall MacGinnis – Group Director for Security.

## 12.0 Appendices

## Appendix A - Definitions and Explanatory Notes

Table 1 – Defined Terms	
Defined Term	Meaning
<b>Business Partner(s)</b>	In relation to the definition of Supplier, means any other entity that has a business partnership with Sky.
<b>Controlled Subsidiar(y)(ies)</b>	means Sky's subsidiaries and affiliates where Sky directly or indirectly owns more than 50% of the voting control.
<b>Supplier(s)</b>	means any firm or individual that provides products, staffing, or services to us, including its personnel, subcontractors, and agents.

Table 2 - Explanatory Notes	
Term	Explanation
<b>third part(y)(ies)</b>	covers any individual or organisation you come into contact with during the course of your work for Sky, including actual and potential clients, customers, Business Partners, Suppliers, business contacts, agents and advisers [but not including Government Officials].

---

## External links

Related resources are detailed on the right-hand side. Sky's local business units may have further policy restrictions or guidelines that you may also be obliged to read and comply with. **Refer to your local business policy intranets for further information.** Below you'll find details of external resources which may be useful.

**Comcast**

[Comcast Corporation Code of Conduct](#)

[Comcast Corporation Code of Conduct for Suppliers and Business Partners](#)

**Sky Group**

[Ways of Working](#) (UK Only at present)

[www.ComcastSkyListens.com](http://www.ComcastSkyListens.com)