

# Human Rights Policy Statement / Declaration of Principles on Human Rights and the Environment Sky Deutschland

## Purpose

To **comply with human rights and environmental due diligence obligations** in accordance with § Section 6 (2) of the Act on Corporate Due Diligence Obligation in Supply Chain of July 16, 2021 (**Supply Chain Due Diligence Act**, Lieferkettensorgfaltspflichtengesetz, **LkSG**). This declaration also complies with the **Sky Group Human Rights Policy** (as of December 2023).

**Sky Deutschland GmbH** is a German media group based in Unterföhring near Munich. The company operates a Pay-TV service via its subsidiary Sky Deutschland Fernsehen GmbH & Co. KG and has itself been a subsidiary of the US Comcast Corporation and Sky Ltd. since October 2018.

## Our Commitment to respecting human rights and environmental rights

Sky respects the rights and wellbeing of people impact through our activities. This includes our employees and contractors, customers, viewers, people who feature in our broadcasts and programmes, workers in our supply chains, visitors to our sites and the communities around them.

As part of our commitment to our responsible corporate governance, we consider the impacts that our business might have on people and the environment.

Human rights are the fundamental rights, freedoms, and standards of treatment to which all people are entitled. Sky respects human rights as defined by the International Bill of Human Rights, including the United Nations Universal Declaration of Human Rights (UDHR); the International Covenant on Civil and Political Rights (ICCPR) and the International Covenant on Economic, Social and Cultural Rights (ICESCR) through our commitment to upholding the United Nations Guiding Principles on Business and Human Rights (UNGPs), the International Labour Organization (ILO) eleven core conventions and the human rights and environmental due diligence obligations of the German Supply Chain Due Diligence Act.

We are also committed to relevant initiatives including the UN Global Compact; the Responsible Business Association (RBA) Code of Conduct, the OECD Guidelines for multinational Enterprises, the Children's Rights and Business Principles, and the Women's Empowerment Principles (WEPs) and we are committed to protecting the environment, through our business and value chain.

We believe our media and communications services have a positive impact on society and empower people to access knowledge and exercise their rights and freedoms, and we commit to promoting respect for human rights through our work.

Our commitments are reflected in our Code of Conduct and our Code of Conduct for Suppliers and Business Partners.

## Scope

This Policy focuses on our commitment to promoting values that foster human rights and environmental rights, explaining our overall strategy and approach to respecting human rights and environmental rights in our operations and value chain, and detailing and highlighting our salient human rights risks.

Everyone who works for Sky is expected to comply with this Policy, our Code of Conduct, and all other applicable Policies – including those that set forth our guiding principles and communicate our core values both internally to employees and externally to our business partners and other stakeholders. These include, among other things, our commitment to respecting human rights and fostering a culture of fairness, respect, and inclusion; maintaining a work environment free from discrimination and harassment; protecting the environment and encouraging sustainable innovation and environmentally and socially responsible business decisions; respecting privacy and protecting the personal information we collect; obeying the law everywhere we operate; and nurturing ethical relationships with suppliers and other business partners. We also expect our suppliers and partners to share our commitment to protecting human rights and the environment and to comply with our Code of Conduct for Suppliers and Business Partners and Sky's Human Rights and Environmental Policies.

## Sky's approach

Through our commitment to the UNGPs and our due diligence processes we seek to avoid causing or contributing to actual or potential adverse human rights impacts through our own operations, and that of our business partners and value chain. Upholding the principle to respect human rights by seeking to avoid infringing on the human rights of others and addressing adverse human rights impacts with which they are involved, we conduct risk-based human rights and environmental due diligence and partner with relevant stakeholders across the company to put this policy into practice. Our programs and engagements focus on our most salient risks. We routinely review these risks, seek stakeholder input, and prioritise risks that could contribute to greater impact or disproportionately affect vulnerable individuals.

## Our Salient Human Rights and Environmental Risks

We conduct regular in-depth risk analysis, including assessing scale, scope and severity of human rights and environmental risks, and impacts in our operations and supply chain. Through this process we have identified these salient areas across our operations and supply chain:

- Life, liberty security and health and safety
- Slavery and forced labour
- Just and favourable working conditions, including fair wages
- Responsible Broadcasting including freedom of expression
- Child rights
- Equality & non-discrimination
- Local communities and indigenous peoples' rights
- Privacy

- Mental health and wellbeing
- Freedom of association
- Protection of the environment

## **Implementation of human rights and environmental due diligence**

### **Risk management and responsibilities**

The management of Sky Deutschland's approach to human rights and environmental risks to people in our own business area and within the supply chain, is overseen by Senior Management and company executives who are responsible for monitoring compliance with and oversight of our human rights and environmental due diligence activities, ensuring effective and appropriate risk management. To support this oversight, Sky Deutschland executives and its Board, receive regular and ad hoc reports on risk assessments and risk management.

Sky Deutschland has implemented a cross-functional Human Rights Committee, including our Supply Chain, Procurement, Compliance, Operations and Responsible Business specialists who are accountable for risk assessments and implementation and monitoring of effective actions.

### **Our Human Rights approach:**

- Policy commitment and governance
- Risk and impact assessment
- Implementing effective actions
- Tracking and monitoring
- Communication and reporting
- Grievance and remedy
- Overall meaningful stakeholder engagement.

### **Risk and impact analyses**

Regular risk and impact assessments help us understand the risks associate with our direct, and indirect supply chains of our products and services and business partnerships. Our initial high level risk assessments include key business areas and are performed on a regular basis, using information and data on the type of employment, type of product or service, country and site, to provide us with a view on category and country risks and labour type in addition to environmental risk factors. We conduct desk research and conversations with suppliers and partners to develop our understanding of the supply chain.

Our in-depth risk analysis then happens on a regular and rolling basis. This is undertaken as part of Sky Deutschland's Compliance Risk Management process and applies to our:

- Business operations and supply chain departments, who are regularly consulted for changes throughout the year.
- Our supplier onboarding, and engagement processes have been adapted to include human rights and environmental due diligence.

We apply processes for identifying and assessing activities with heightened risk and potential impact and prioritise areas where potential harm could be most probable, severe, widespread, and irremediable.

For our suppliers, we leverage external risk databases and tools to review country, region and category risk profiles and carry out heightened due diligence when human rights risks are elevated.

We also conduct ad hoc risk analyses where needed. These processes and documents all feed into our Group Compliance Risk Scorecard on human rights.

### **Preventative measures and process integration**

In our prioritised risk areas, we implement adequate preventive measures, regularly review their effectiveness, and make improvements where necessary.

- **Capacity building and training** – We provide training to communicate our approach to respecting human rights and environmental rights and the requirements of legislation including the UK Modern Slavery Act and German Supply Chain Due Diligence Act (LkSG). We also make training accessible to our suppliers, provided by Sky, external experts, and the RBA.
- **Responsible purchasing practices** - We exercise responsible purchasing practices including responsible supplier selection, and considerations regarding lead times and duration of contracts which are built into our supplier engagement – from tender, to onboarding, during partnership and when considering impacts of our exit.
- **Due diligence assessments** - We conduct due diligence assessments within our operations, direct and indirect supply chains. High risk suppliers are assessed, where possible, before contract and within the contract. This includes on-site assessments and third-party ethical audits, including RBA audits. We are committed to reviewing the implementation of corrective measures and ensuring they are documented.
- **Responsive due diligence** - We implement due diligence approaches that are sensitive to the experiences of marginalised groups, such as migrant workers, taking a gender sensitive approach and adapting or implementing enhanced due diligence in rapidly changing contexts such as conflicts or natural disasters.
- **Assessments** - We have conducted an external salient risk assessment and maturity assessment of our responsible sourcing processes, which informs about continual improvement approaches.
- **Collaborative initiatives** - We actively participate in collaborative initiatives to advance industry progress on human rights. This includes the RBA, TV Industry Human Rights Forum and Centre for Sport and Human Rights, and other initiatives focused on mitigating risk in specific indirect spend areas.
- **Stakeholder engagement** - We seek insights and advice on our preventative and remedial measures from human rights experts. Employee, supplier, and partner engagement is at the centre of our risk management approach. We conduct worker surveys in prioritised areas.
- **Implementation and Monitoring** - We regularly review the effectiveness of our complaints procedure and make adjustments to strengthen it where necessary.

## **Complaints Procedure and Remedial actions**

We want to know about any concerns. Our employees, suppliers, and business partners around the world are encouraged to report suspected illegal or unethical conduct, including suspected human rights and environmental issues in our businesses or in our supply chains, through our Sky Listens program. Our program provides several channels for speaking up, including a 24-hour helpline and web portal that is administered by an independent third-party company. Our web portal is available in 15 languages and dialects and is publicized in our Code of Conduct and Code of Conduct for Suppliers and Business Partners.

Sky's Speak Up Policy describes how concerns can be raised through our Sky Listens programme. The policy is available on our Corporate Website. It is also promoted at key sites in our supply chain. When concerns are raised, we inform the reporter of receipt and progress on the complaint. We take all concerns seriously and investigate them carefully.

Company policy prohibits retaliation against those who, in good faith, raise a concern or assist in the investigation of suspected illegal or unethical conduct, even if a reported concern is ultimately unsubstantiated. Any violation of our anti-retaliation policy may result in disciplinary action, up to and including termination.

For any concerns raised or identified through our risk assessment procedures, we are committed to promptly investigating the allegations, and ensuring that imminent risk or further harm can be prevented. We then seek or pursue action to remedy and mitigate any adverse human rights impacts, while prioritising appropriate remedies to any impacted parties.

## **Documentation, communication, and reporting**

We document our risk assessment and risk management procedures including, investigation and remediation efforts. We communicate our approach and progress through the Comcast Modern Slavery Statements, our annual sustainability reports and from 2023 forward will report annually to the German Federal Office for Economic Affairs and Export Control (BAFA) on our implementation of the LkSG requirements.

## **Stakeholder engagement**

We seek to engage stakeholders on how to effectively reach the aims of our policy, in our risk and impact assessments, in the development of preventative and remedial measures and in the processing of complaints. Our stakeholders include human rights and topical experts, workers, suppliers, audiences, customers and their communities, governments, civil society organisations, multi-stakeholder groups and membership groups.

### **How this policy has been developed & reviewed**

This policy is annually reviewed considering the organisational, legal, or business and supply chain changes that may occur, for the purpose of maintaining its pertinence, sufficiency, and effectiveness. The policy was developed following a review process which includes input from internal business departments including, Procurement, Supply Chain, Compliance, Responsible Business and Sustainability functions. Input has also been sought on Sky's salient issues from external human rights experts. Our progress against this policy will also be consulted on with these stakeholder groups. This is the first version of the declaration of principles and accordingly no adjustments were necessary due to newly added risks or detected violations; in the event of future adjustments, Sky Deutschland GmbH will adapt the policy statement and indicate the corresponding adjustments that were made, as part of the intended transparency.

Management Board Sky Deutschland GmbH, December 2023