



## NBCUniversal Code of Conduct for Production Personnel

Comcast Corporation, including Comcast Cable, NBCUniversal, Universal Studio Group, and Sky (collectively, “we”, “us”, “our”, or “Company”), is committed to operating with integrity and in accordance with applicable laws and regulations. We hold our employees to high standards set forth in our Code of Conduct, and expect our personnel employed on our productions (“Production Personnel” or “you”) to follow the same high standards in this Code of Conduct for Production Personnel (“Code”).

By working on our productions, you play an important role in our business, and we expect you to act ethically, share in the commitments in this Code, and abide by them and other policies that apply to Production Personnel. Specifically, we expect you to operate in compliance with applicable laws and regulations in connection with your work. By performing work with the Company, you acknowledge that you will conduct yourself in accordance with this Code and its requirements.

Where this Code sets higher standards than what the law requires, we expect you to adhere to our standards in the Code. This Code supplements, but does not supersede, your contract with us. To the extent there is any inconsistency between this Code and any provision of your contract with us, the contractual provision will control. Our business units may have additional or more specific policies or requirements in any of these topics.

### Treat People Fairly and with Respect

We treat colleagues and workers with dignity, employ them on the basis of their ability to do the job—not on the basis of their personal characteristics or beliefs—and treat them fairly and in accordance with applicable laws and regulations regarding labor and employment.

- **No Discrimination or Harassment.** Conduct yourself in a manner that fosters an inclusive and non-discriminatory working environment where all workers are treated with respect and dignity. This includes not engaging in any form of harassment or discrimination based on an individual’s race, color, ethnicity, sex (including pregnancy), sexual orientation, gender and gender identity or expression (including transgender status for those who are transitioning or have transitioned), religion, creed, age, marital status, national origin or ancestry, citizenship or immigration status, medical condition, physical or mental disability, genetic information, military or veteran status, or any trait or status that is protected by law (which may vary from country to country). We will not tolerate any conduct by Production Personnel that is discriminatory, harassing, offensive, bullying, or retaliatory, or otherwise inconsistent with a respectful workplace.
- To the extent you engage in hiring workers, we expect you to abide by the following commitments:
  - **Prevention of Forced Labor and Human Trafficking.** Ensure that all labor is voluntary and that no abusive, exploitative, or illegal conditions exist in your hiring or other human resources practices. Do not support or engage in forced labor, including but not limited to human trafficking; take steps to recruit responsibly and hold your agents and recruiters to the same standards. Do not impose unreasonable restrictions on your workers’ freedom of movement from or within or outside the workplace, including impeding their ability to exit your facilities, and do not withhold workers’ government-issued identification or travel documents. You should not charge workers any fees or costs for being recruited, nor should you prevent or charge them for obtaining any sum owed to them.

- **Prevention of Underage Labor.** All workers shall meet the applicable legal minimum age requirements or be at least 16 years of age, whichever is greater. Do not allow young workers (as defined by applicable law) to undertake night work, overtime, or any hazardous work.
- **Inclusive Supply Chain.** Cultivate diversity by supporting diverse businesses and providing them with fair opportunities to bid and acquire contracts.
- **Lawful Employment.** Employ workers who have the legal right to work in the host jurisdiction, including reviewing relevant documentation as appropriate.
- **Freedom of Association.** Follow applicable local laws and regulations governing the rights of workers to form and join worker organizations.
- **Wage and Benefits.** Pay your workers in a timely manner and provide compensation (including overtime pay and benefits) required by law and/or contract. Overtime must be paid in accordance with applicable law. We expect you to abide by legal limits on the number of working hours and any applicable international standards and prohibit the use of forced overtime or unfair deductions from pay.
- **Health and Safety.** Implement appropriate procedures, controls, and safeguards to provide a safe, secure, and healthy working environment to your workers and subcontractors, as well as the members of the public in communities where you operate. Ensure that you are meeting applicable legal requirements and best practices and that your workers are provided with relevant training and are consulted as appropriate on health and safety procedures.

## Promote Health and Safety

We are committed to providing a safe work environment and promoting individual health and wellbeing. We comply with applicable workplace health and safety laws and regulations and operate our business in a way that minimizes risk of injury to our personnel. We encourage our Production Personnel to identify and report any potential unsafe behavior or practices in the workplace.

## Conduct Yourself Lawfully and with Integrity

We expect you to carry out your work honestly and ethically, and in full compliance with applicable laws and regulations in the countries and jurisdictions in which you work.

- **Compliance with Laws.** Comply with applicable laws and regulations within the states and countries that you work, including antitrust or competition laws, laws relating to working with governments, anti-money laundering and anti-tax evasion laws, and treaties and regulations in connection with international trade.
- **Anti-Bribery/Anti-Corruption Laws.** Abide by applicable anti-corruption laws and regulations, and do not seek to influence anyone, directly or indirectly (through a third party), through bribes or kickbacks or any other improper or unethical means, or in a manner that could compromise our Company's reputation and values. All gifts and business entertainment involving our Company must be: offered or accepted with a valid business purpose; prudent and reasonable by local and industry standards; proper in appearance and without risk of embarrassment or harm to our reputation; and in compliance with the law. Never provide, on our behalf, any gift or business entertainment to any government official regardless of the amount, or make contributions to any political party, official or candidate in connection with work that you do for us, unless we provide advance written approval. Consult your supervisor for appropriate pre-approval.
- **Conflicts of Interest.** Avoid any situation that may involve a conflict of interest. Do not use our information for a personal benefit or to promote a competing business or activity. Disclose to us any actual, potential, or perceived conflicts of interest with the work you do for us resulting from personal or

business relationships with us and our employees, customers, business partners, or our competitors.

- **Business Records.** Maintain books and records that accurately and completely reflect all financial transactions related to your work. Never make any entry in our financial books and records or alter, conceal, or destroy any document to misrepresent any fact, circumstance, or transaction. Ensure you have appropriate authorization for each expense and maintain appropriate supporting documentation.
- **Insider Trading.** Do not buy or sell securities when in possession of material, non-public information, and do not share such information with others for any improper purpose.
- **Political Activities.** Our interactions with governments and our political activities comply with applicable laws, regulations, and Company policies. We also recognize that employees and Production Personnel may participate in their personal capacity in political activities in the communities in which we live and work. When engaging in political activities and interacting with government, we adhere to the highest legal and ethical standards, and comply with Company policy.

## Protect and Respect Privacy, Information, and Property

We expect you to safeguard and only make proper use of information or assets that you learn in connection with your work, and to abide by all information protection and privacy laws that apply to your work.

- **Respect Privacy.** Share our commitment to protect and respect the privacy rights of our employees, customers, and business partners, and handle their information with care. We are subject to many laws and regulations that govern the collection and use of personal information. If we share personal or proprietary information with you about us or our customers or other third parties, or allow you to access it, you must handle and use it in compliance with applicable privacy laws and the terms of your contract with us. You must also ensure that only authorized personnel are allowed to access our information, and you must not disclose our information to any third party without our authorization, unless required by law. You must immediately notify your supervisor if any Company information has been, or is suspected to have been, lost, stolen, or inappropriately accessed, used, or disclosed.
- **Protect Our Intellectual Property and Other Assets.** Safeguard our intellectual property (e.g., our brands, trademarks, know-how, inventions, patents, content and other copyrighted materials, trade secrets, strategies, computer programs, and media properties, including websites and apps) from unauthorized access, theft, waste, cyber-related attack, misuse, unauthorized distribution, or other type of loss. Technology assets, email systems, and information assets, and customer relationships, are the Company's property and should be used for Company-related business purposes only.
- **Maintain Secure Systems.** Implement and maintain appropriate physical, technical, and organizational measures, as applicable, to ensure the security, confidentiality, integrity, and availability, of your systems, processes, and services, and securely maintain the data you receive or access from or hold on behalf of the Company.
- **Business Continuity.** As applicable, assess the risk of potential emergencies and other disaster events and implement appropriate plans and response procedures that would minimize an event's impact on your business, including service assurance and recovery plans for products and/or services that you provide to us, as required by us.

## Communicate Responsibly

We do not speak on behalf of the Company unless authorized to do so. We make sure that our external communications are honest and accurate. In any communication that may reflect on the Company, whether on the job or in our own time, we communicate professionally, maintain confidentiality, and are mindful of the repercussions our words can have on the Company's business and reputation. This is true in person, over the telephone, via email, and on social media.

## Foster Ethical Relationships with Business Partners and Respect the Environment

We strive to partner only with those who share our values. A critical part of doing business is partnering with others, and we believe that partnerships are built on trust and mutual advantage. We interact honestly and with integrity in the marketplace and expect our business partners to do the same. We evaluate potential business partners on the basis of their quality, reliability, performance, price, service, and technical requirements.

As a business, we are committed to minimizing our impact on the environment. This includes working towards zero emissions and zero waste (including for single-use plastic), conserving natural resources, and sourcing responsibly. We expect our business partners to operate in an environmentally responsible and efficient manner and comply with applicable environmental laws and regulations. We ask our business partners to support our relevant initiatives and provide relevant reporting on progress, if requested.

- **Sustainable Business Practices.** At a minimum, conduct your operations in a manner that makes reasonable efforts to meet industry best practices and standards to minimize the impact on the environment. Mitigate and manage your impact on natural resources, emissions and discharges of pollutants, and other environmental effects that may arise from your business operations, including your work on new or modified products for us.
- **Responsible Sourcing of Materials.** Source product materials responsibly, develop more efficient and sustainable packaging for those products, and minimize or eliminate the use of hazardous substances in products provisioned to us – and if your product does contain hazardous materials or conflict minerals, you must adhere to applicable laws and regulations, including regarding labeling. Upon request, you must also support any effort by us to identify the type, origin, and chain-of-custody of materials used in the manufacture of products.
- **Environmental Permits and Reporting.** Obtain, keep current, and comply with all required environmental permitting rules and reporting requirements applicable to your operations.

## Prevent Workplace Violence

The safety of our people and operations is critically important to us. We have implemented procedures, including emergency response plans, that help safeguard our people and property. We expect you to take an active role in helping to ensure the safety of our teams and to minimize impacts to our customers and business operations. Contact [Production Security](#) with any questions or concerns.

## Seek Guidance and Raise Concerns

Whether you have a question or a concern about a workplace issue or suspected illegal or unethical conduct, we want you to speak up and we've made it easy to do so. If you have a question or concern about compliance with any provision in this Code, we encourage you to work with your supervisor to get the answers you need to comply.

If you have a concern about potential illegal or unethical conduct, please report it to your supervisor, your HR representative, another local leader, or visit [www.ComcastNBCUniversalListens.com](http://www.ComcastNBCUniversalListens.com).

Concerns related to accounting, internal accounting controls, or auditing matters may also be sent to [Audit\\_Committee\\_Chair@comcast.com](mailto:Audit_Committee_Chair@comcast.com) and will be handled in accordance with procedures established by the Audit Committee of the Comcast Corporation Board of Directors.