



Sky's Responsible Sourcing Policy

Introduction

Sky is committed to the highest possible standards of environmental, ethical and social responsibility performance in respect of all its products and services. Sky strives to be the best for its customers and its people, and looks to make a positive contribution to society wherever it operates.

This Responsible Sourcing Policy document (the "Policy") provides details of the environmental, ethical and social responsibility standards that Sky expects its suppliers to adhere to, in order to support Sky's commitment to delivering the best possible products and services.

Suppliers are expected to adhere to these standards at all times. Sky aims to be a good partner in return, and will work with suppliers to support any necessary improvements, encourage continual improvement, and reward good performance. Consequently, if suppliers fall short of this Policy, Sky will expect such suppliers, working collaboratively with Sky, to rectify issues and make appropriate changes. If a supplier is unwilling to work in this way then Sky may discontinue the relationship with that supplier.

Aim

The purpose of this Policy is to ensure that Sky receives from suppliers, and delivers to its customers, high-quality, trusted products and services. It is also intended to assist with minimising any negative impacts, adopting sustainable practices and to positively influence the environmental, ethical and social impacts associated with Sky activities, products and services. For the purpose of this Policy, the term "supplier" is used to describe any first tier company that has contracted (or is intending to contract) with Sky for the supply of products and/or services.

Sky acknowledges that working closely with its stakeholders, including suppliers and other business partners, will inspire innovation in the nature and quality of products and services, which will ultimately enable a better experience to be delivered to all customers.

Suppliers' Requirements

Sky expects the full engagement and commitment of its suppliers in respect to the fulfilment and discharging of any legal obligations that exist or that arise in connection with environmental, ethical and social legislation, any contractual arrangement(s) and Sky company policies. The supplier will also ensure that its own environmental, ethical and social responsibility policies are managed and implemented with the highest care and priority.

Sky expects each of its suppliers to adhere to the Policy throughout its supply chain and with all subcontractors used to supply to Sky. To this end, the supplier will ensure that all requirements of the Policy are addressed with subcontractors and third parties (including lower tier suppliers) in its supply chain, mirroring terms in any contractual arrangements with each subcontractors and/or third party as needed.

- Environmental Management

Without limiting any other provision of this Policy or of any contract or obligation that the supplier has entered into with Sky, it is expected that the supplier will at the very least, across its own operational processes and also any products and services supplied, meet all applicable local, national and international environmental regulations and provide evidence accordingly. All required environmental permits, licenses, information registrations and restrictions will be obtained and their operational and reporting requirements followed and maintained. Suppliers are expected to promptly notify Sky of any breach of, or other failure to comply with, any applicable environmental law or regulation and indicate the proposed remedial and/or corrective action to be taken.

Suppliers shall also operate in an environmentally responsible and efficient manner to minimise adverse impacts on the environment; whilst ensuring safe handling, movement, storage, recycling, reuse, or



management of waste, air emissions and wastewater discharges and preventing any spills/releases. We strongly encourage our suppliers to conserve natural resources, and consider the reusability/recyclability of products and services provided to Sky.

- **Ethical and Social Responsibility**

Notwithstanding requirements set out by local, national and international laws and regulations regarding ethical and social conditions (such as labour and working conditions, health and safety, human rights, and bribery and corruption), Sky expects all suppliers to act with the highest possible regard for social responsibility.

Without limiting any other requirement of this Policy, or a supplier's contract with Sky, suppliers are expected to:

- Ensure that all supplier employees can make a free choice about working for the supplier: there should be no illegal, forced, bonded or involuntary labour;
- Ensure that employees are not required to lodge "deposits" or their identity papers;
- Provide a safe and hygienic workplace, taking adequate and necessary steps to prevent accidents and injury to health, and to appoint a member of the senior management as H&S representative;
- Engage their staff, providing regular and recorded health and safety training, especially to new or reassigned workers;
- Provide clean toilet facilities, potable water and clean and safe food storage and accommodation where appropriate;
- Ensure that no underage workers are employed, either directly or indirectly.
 - If suppliers do find that they have children¹ working for them, Sky expects them to have policies and plans that enable the children to move into or remain in education.
- Pay wages which at least meet minimum national legal standards, minimum living wage or industry benchmark standards, whichever is higher;
- Ensure that everyone is working in a recognised employment relationship as defined in the law, and explain clearly to employees their terms and conditions and the work that wages relate to;
- Ensure workers do not work more hours than set out by relevant local and national laws and regulations. However using the Ethical Trading Initiative as recommended guidance, we expect suppliers to go beyond legal requirements and restrict both working and overtime hours, and provide a commitment to all workers for appropriate rest days per working week;
- Ensure overtime work is voluntary, used responsibly and compensated fairly;
- Ensure employees are treated well. Corporal punishment, abuse, harassment or intimidation of employees on any grounds is completely unacceptable;
- Ensure that there is no discrimination in respect of hiring, pay, development, termination or retirement – on any grounds other than fitness for the job;
- Have effective and working communications between managers and employees; and
- Manage their own supply chain responsibly, encouraging their suppliers to take positive actions to improve environmental, ethical and social standards where necessary.

- **Monitoring**

The supplier is expected to ensure that all necessary and reasonably required data and reporting is produced in a complete, accurate and timely fashion to enable Sky to complete its own data reports and submissions to the relevant authorities.

- **Suppliers' Responsible Sourcing Questionnaire**

Any chosen supplier will be required to complete annually or at such other time as agreed, the Sedex² Responsible Sourcing Questionnaire, which aims to ensure that all data recorded in the Sky database is maintained up to date and that Sky is provided with evidence of legal compliance against the requirements of this Policy.

¹ "We define a "child" as anyone below 15 years of age, unless the legal minimum age or mandatory school leaving age is higher. (In developing countries listed in ILO Convention 138, Articles 6&7 we accept child workers of 14 or over

² Sedex is the Supplier Ethical Data Exchange, a not for profit membership organisation dedicated to driving improvements in responsible and ethical business practices in global supply chains. Data disclosed in Sedex is treated confidentially and can only be shared between companies who are in a supply chain relationship. Access is only granted to member companies within the supply chain, following a supplier driven approval process.