

Sky's Germany & Austria 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.

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 a supplier falls short of this Policy, Sky will expect such supplier, working collaboratively with Sky, to rectify issues and make appropriate changes. If a supplier is unwilling to work in this way then Sky may, at its discretion, 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 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 relevant 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, as needed. 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 their products and services.

- **Ethical and Social Responsibility**

Notwithstanding the requirements of 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, each supplier is expected to:

Conduct business lawfully and with integrity

- Conduct its' business with integrity and prohibit bribery, or other means of obtaining undue advantage, whether directly or indirectly;
- Manage any supply chain responsibly, encouraging sub-suppliers to take positive actions to improve environmental, ethical and social standards wherever relevant

Treat workers equally, and ensure work conducted on voluntary basis

- Respect the human rights of all employees and the rights of the communities in which they operate;
- Ensure employees are treated well and respect human rights. Corporal punishment, abuse, harassment or intimidation of employees on any grounds is completely unacceptable;
- Ensure that it does not discriminate in respect of its hiring, pay, development, termination or retirement policies – or on any grounds other than fitness for the job;
- Ensure that all employees can make a free choice about their employment: there should be no illegal, forced, bonded, involuntary or exploited labour;
- Ensure there is no involvement in incidences of human trafficking or involuntary movement of persons for exploitation

Reasonable working hours

- Ensure employees do not work hours in excess of the limitations set by relevant local and national laws and regulations. We expect suppliers to go beyond legal requirements to restrict both working and overtime hours in line with the guidance specified in the Ethical Trading Initiative, and by providing a commitment to all workers for appropriate rest days during any relevant working period or block

Workers are of an appropriate age

- Ensure that no underage workers are employed, either directly or indirectly
 - If suppliers do find that they have children¹ working for them, Sky expects the supplier to have policies and plans in place that enable the children to move into or remain simultaneously in education

Workers are paid fair wages

- Pay wages which at least meet minimum national legal standards; but pay minimum living wage or industry benchmark standards wherever possible;
- Ensure overtime work is voluntary, used responsibly and compensated fairly;
- Ensure that everyone is working in a recognised employment relationship as defined by law, and explain clearly to employees the terms and conditions of their employment, and the expected work output to which their wages relate

Workers have the right to form and/or join trade unions if desired

- Allow the right to form or join Trade Unions (as may be relevant or desired) and to bargain collectively

Workers health and safety in the workplace is protected

- Provide a safe and hygienic workplace, taking adequate and necessary steps to prevent accidents and injury to health, and to appoint a senior employee as a health and safety representative;
- Engage staff in health and safety education, providing regular and recorded training, especially to new or reassigned workers;
- Provide clean toilet facilities, potable water and clean and safe food storage and accommodation where appropriate; ensure there are effective and clear communications between managers and employees

Ensure access to fair procedures and remedies

- Ensure that employees are not required to lodge "deposits" or their identity papers prior to commencement of employment;
- Allow free and confidential access to remedy/grievance mechanisms as may be relevant or required

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 reports and submissions to any relevant authority.

Suppliers' Responsible Sourcing Questionnaire

Any chosen supplier will be required to complete annually (or at such other time as required by Sky), 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 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.