



VIA Fedex: 781608224713 & Email

December 17, 2020

Thomas J. Reid, Secretary
Comcast Corporation
One Comcast Center
Philadelphia, PA 19103

Dear Mr. Reid,

United Church Funds manages investment assets for over 1,000 churches and faith-based institutions across the country. Standing on the values of our clients, we integrate environmental, social and governance analysis (ESG) into investment decision making and engagement.

We are acting as a co-filer of this resolution with Comcast Corp. seeking a report on diversity and inclusion efforts. We consider As You Sow as the lead filer of this resolution.

We are co-filing the attached shareholder proposal for inclusion in the 2021 proxy statement, in accordance with Rule 14a-8 of the General Rules and Regulations of the Securities Exchange Act of 1934. We have been a shareholder continuously for more than one year holding at least \$2,000 in market value and will continue to invest in at least the requisite number of shares for proxy resolutions through the annual shareholders' meeting. A representative of the filers will attend the Annual Meeting to move the resolution as required by SEC rules. The verification of ownership by our custodian, a DTC participant, is enclosed with this letter.

As You Sow may act on our behalf in withdrawing this resolution. Please contact me if there are any questions.

Best regards,

A handwritten signature in black ink, appearing to read "Matthew J. Illian".

Matthew J. Illian
Director of Responsible investing
475 Riverside Drive, Suite 1020
New York, NY 10115
matthew.illian@ucfunds.org



BNY MELLON

240 Greenwich Street
6th Floor
New York, NY 10286

December 17, 2020

Re: United Church Funds Verification of Ownership

To whom it may concern,

This letter is to confirm that BNY Mellon as custodian for United Church Funds holds at least \$25,000.00 worth of **Comcast Corporation** stock. Further, United Church Funds has continuously held this position for at least twelve months prior to **Dec. 17 2020** and intend to continue holding the requisite number of shares of common stock through the date of the next Annual Meeting of Shareholders.

If you have any questions regarding this information, please contact me at (212) 815-2229 or joyce.walsh@bnymellon.com.

Sincerely,

Joyce S. Walsh

Joyce S. Walsh, Vice President
The Bank of New York Mellon

Resolved: Shareholders request that Comcast Corporation (“Comcast”) publish annually a report, at reasonable expense and excluding proprietary information, assessing the Company’s diversity and inclusion efforts. At a minimum the report should include:

- the process that the Board follows for assessing the effectiveness of its diversity, equity and inclusion programs,
- the Board’s assessment of program effectiveness, as reflected in any goals, metrics, and trends related to its promotion, recruitment, and retention of protected classes of employees.

Supporting Statement: Investors seek quantitative, comparable data to understand the effectiveness of the company’s diversity, equity, and inclusion programs.

Whereas: Numerous studies have pointed to the corporate benefits of a diverse workforce. These include:

- Companies with the strongest racial and ethnic diversity are 35 percent more likely to have financial returns above their industry medians.
- Companies in the top quartile for gender diversity are 21 percent more likely to outperform on profitability and 27 percent more likely to have superior value creation.¹
- A 2019 study of the S&P 500 by the *Wall Street Journal* found that the 20 most diverse companies had an average annual five year stock return that was 5.8 percent higher than the 20 least-diverse companies.²

Despite such benefits, significant barriers exist for diverse employees advancing within their careers. Women enter the workforce in almost equal numbers as men (48 percent). However, women comprise only 22 percent of the executive suite. Similarly, people of color comprise 33 percent of entry level positions, but only 13 percent of the c-suite.³

On its website, Comcast states: “Across every business unit at Comcast NBCUniversal, we are focused on advancing diversity and inclusion by hiring the best diverse talent and creating a culture in which every employee feels included, valued, and empowered.”⁴ Despite this statement, Comcast has not released meaningful information that allows investors to determine the effectiveness of its human capital management programs related to workplace diversity. Stakeholders may become concerned that Comcast’s statements are corporate puffery, language described by the United States Federal Trade Commission as marketing exaggerations intended to “puff up” companies or products and not able to be relied upon by consumers and investors.

Investors have reason to be concerned as Comcast has faced damaging allegations of harassment and discrimination on the basis of gender, race and sexual orientation.

¹McKinsey & Company, “Delivering through Diversity”, January 2018
https://www.mckinsey.com/~media/mckinsey/business%20functions/organization/our%20insights/delivering%20through%20diversity/delivering-through-diversity_full-report.ashx

² Holger, Dieter, “The business case for more diversity” Wall Street Journal, October 26, 2019
<https://www.wsj.com/articles/the-business-case-for-more-diversity-11572091200>

³ McKinsey & Company, “Women in the Workplace 2018”, (<https://womenintheworkplace.com/>)

⁴ https://update.comcast.com/wp-content/uploads/sites/33/dlm_uploads/2019/05/ComcastNBCU_print_0730-web.pdf

Investor desire for information on this issue is significant. As of October, 2020, \$1.9 trillion in represented assets released an Investor Statement on the importance of increased corporate transparency on workplace equity data. It stated:

It is essential that investors have access to the most up-to-date and accurate information related to diverse workplace policies, practices, and outcomes.⁵

⁵ <https://www.asyousow.org/our-work/gender-workplace-equity-disclosure-statement>