

Modern Slavery Statement For Fiscal Year 2020

- This statement sets out the steps that we, News Corp, have taken across the News Corp Group¹ to address the risks of modern slavery in any part of our business, operations or supply chains. This statement relates to actions and activities during the financial year 2020, from 1 July 2019 to 30 June 2020.
- This statement is set out in the following four parts:
 1. Introduction
 2. Overview of News Corp
 3. Risk of Modern Slavery Practices
 4. Actions to Address Risks of Modern Slavery

1. Introduction

STATEMENT FROM CHIEF EXECUTIVE OFFICER

News Corp recognizes the importance of combating modern slavery, a crime that affects communities and individuals across the globe. We endorse a purposeful mission to improve the lives of others, as well as a passionate commitment to opportunity for all. Accordingly, we are wholly opposed to such abuses of a person's freedoms in our direct operations, our indirect operations and our supply chains.

We are proud of the business standards News Corp upholds, as set out in the News Corp Standards of Business Conduct (the **News Corp SOBC**) (see <https://newscorp.com/corporate-governance/standards-of-business-conduct/>) and are proud of the steps we have taken, and are committed to build upon, to ensure that the risks of modern slavery in our business, operations or our supply chains are addressed.



Robert Thomson
CEO, News Corp
5 August, 2020

OVERVIEW

News Corp (together with its subsidiaries, **News Corp**, the **Group**, the **Company**, **we** or **us**) is a global diversified media and information services company focused on creating and distributing authoritative and engaging content and other products and services to consumers and businesses throughout the world. The Company comprises businesses across a range of media, including digital real estate services, subscription video services in Australia, news and information services and book publishing, that are distributed under

¹ News Corp is a global diversified media and information services company principally consisting of the entities listed on page 163 of [News Corp's 2020 Annual Report](#)

some of the world's most recognizable and respected brands, including *The Wall Street Journal*, *Barron's*, Dow Jones, *The Australian*, *Herald Sun*, *The Sun*, *The Times*, HarperCollins Publishers, Foxtel, FOX SPORTS Australia, realestate.com.au, realtor.com®, talkSPORT and many others. It employs approximately 23,500 employees globally and operates globally.

News Corp is a Delaware corporation with a primary listing on The Nasdaq Global Select Market (**Nasdaq**), subject to the reporting requirements of Nasdaq and the U.S. Securities and Exchange Commission (**SEC**). In addition, CHESS Depository Interests (**CDIs**) representing the Company's common stock also trade on the Australian Securities Exchange (**ASX**). A list of all News Corp subsidiaries, and their countries of registration, is provided in News Corp's 2020 Annual Report on Form 10-K ([see Exhibit 21.1](#)) The 2020 Annual Report on Form 10-K includes the consolidated financial statements of News Corp and these subsidiaries. For the fiscal year ended June 30, 2019, News Corp reported total global revenue of \$10.07 billion. For the fiscal year ended June 30, 2020, News Corp reported total global revenue of \$9.01 billion.

MEANING OF MODERN SLAVERY

This statement is made for the purpose of satisfying the requirements of both the United Kingdom's Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 (**Modern Slavery Legislation**). For the purposes of this statement, the definition of modern slavery is based on the definitions set out in the Modern Slavery Legislation. We recognize that modern slavery can occur in many forms, such as slavery, servitude, forced labor, child labor, human trafficking both in persons and children, organ trafficking and workplace abuse and it can include the restriction of a person's freedom of movement whether that be physical, non-physical or, for example, by the withholding of a worker's identity papers.

RESPONSIBILITY FOR COMPLIANCE

The News Corp Global Compliance team, assisted by Corporate Audit and local legal, compliance, human resources, finance and procurement teams, co-ordinate and are responsible for all necessary activities to monitor the relevant News Corp companies' compliance with the values and standards as set out in this statement.

The News Corp Global Compliance team is responsible for designing policies, procedures and training programs that have global application at News Corp to help all employees know about and act within all relevant laws and News Corp policies. As part of that, it co-ordinates management communication to employees regarding the importance of compliance. Using these channels of communication, there is meaningful and ongoing dialogue between News Corp and each of the entities it owns or controls to ensure that modern slavery risks have been appropriately identified, assessed and addressed and that these other entities are aware of what actions they need to take. This process of consultation culminates in each relevant subsidiary of News Corp being in a position to approve this statement as confirmed below.

APPROVAL PROCESS

This statement is made pursuant to section 54(1) of the United Kingdom Modern Slavery Act 2015 and section 14(1) of the Australian Modern Slavery Act 2018 and constitutes the modern slavery statement for the fiscal year ending 2020 for News Corp, as a joint statement, inclusive of the relevant subsidiaries of News Corp to which the Modern Slavery Legislation applies. In Australia, these relevant subsidiaries are News Corp Australia Pty Limited² and its various subsidiaries; and NXE Australia Pty Limited and its subsidiaries³. While

² During FY20 News Australia Holdings Pty Limited was the relevant reporting entity under the Australian Modern Slavery Act 2018 covering Australian operations in the News Media, Subscription Video Services and Digital Real Estate Services business segments as described in more detail at <https://www.newsCorpaustralia.com/about-news/about>. On July 3, 2020, the majority of these operations were consolidated under News Corp Australia Pty Limited.

³ NXE Australia Pty Ltd is more commonly referred to as 'Foxtel' with operations as described in the Subscription Video Services segment below; and as described in more detail at <https://www.foxtel.com.au/about/company.html>

the REA Group is a subsidiary of News Corp, and a reporting entity for the purposes of the Australian Modern Slavery Act 2018, it has determined that it will be preparing and giving a separate modern slavery statement to the Minister.

The board of directors of the Company⁴ and each of the relevant subsidiaries of News Corp have, at properly convened board meetings, viewed a copy of this statement, approved it; and in the case of the Company delegated authority to the CEO of the Group to sign it on their behalf.

2. Overview of News Corp

The Company manages and reports its businesses in the following six segments:

- **Digital Real Estate Services**—The Digital Real Estate Services segment consists of the Company's 61.6% interest in REA Group and 80% interest in Move. The remaining 20% interest in Move is held by REA Group. REA Group is a market-leading digital media business specializing in property and is listed on the ASX (ASX: REA). REA Group advertises property and property-related services on its websites and mobile apps across Australia and Asia, including Australia's leading residential, commercial and share property websites, realestate.com.au, realcommercial.com.au and Flatmates.com.au, and property portals in Asia. In addition, REA Group provides property-related data to the financial sector and financial services through an end-to-end digital property search and financing experience and a mortgage broking offering.

Move is a leading provider of digital real estate services in the U.S. and primarily operates realtor.com®, a premier real estate information and services marketplace. Move offers real estate advertising solutions to agents and brokers, including its ConnectionsSM Plus and AdvantageSM Pro products as well as its referral-based services. Move also offers a number of professional software and services products, including Top Producer® and ListHub™.

- **Subscription Video Services**—The Company's Subscription Video Services segment provides video sports, entertainment and news services to pay-TV subscribers and other commercial licensees, primarily via cable, satellite and internet distribution, and consists of (i) the Company's 65% interest in Foxtel (with the remaining 35% interest in Foxtel held by Telstra, an ASX-listed telecommunications company) and (ii) Australian News Channel (**ANC**). Foxtel is the largest pay-TV provider in Australia, with nearly 200 channels covering sports, general entertainment, movies, documentaries, music, children's programming and news. Foxtel offers the leading sports programming content in Australia, with broadcast rights to live sporting events including: National Rugby League, Australian Football League, Cricket Australia, the domestic football league, the Australian Rugby Union and various motorsports programming. Foxtel also operates Foxtel Now, an over-the-top, or OTT, service that provides access across Foxtel's live and on-demand content, Kayo, its sports OTT service, and Binge, its recently launched on-demand entertainment OTT service.

ANC operates the SKY NEWS network, Australia's 24-hour multi-channel, multi-platform news service. ANC channels are distributed throughout Australia and New Zealand and available on Foxtel and Sky Network Television NZ. ANC also owns and operates the international Australia Channel IPTV service and offers content across a variety of digital media platforms, including web, mobile and third party providers.

- **Dow Jones**—The Dow Jones segment consists of Dow Jones, a global provider of news and business information, which distributes its content and data through a variety of media channels including newspapers, newswires, websites, applications, or apps, for mobile devices, tablets and e-

⁴ The board of directors of the Company approved this statement in a duly convened board meeting on August 5, 2020.

book readers, newsletters, magazines, proprietary databases, live journalism, video and podcasts. Dow Jones's products, which target individual consumer and enterprise customers, include *The Wall Street Journal*, Factiva, Dow Jones Risk & Compliance, Dow Jones Newswires, *Barron's* and MarketWatch.

- **Book Publishing**—The Book Publishing segment consists of HarperCollins, the second largest consumer book publisher in the world, with operations in 17 countries and particular strengths in general fiction, nonfiction, children's and religious publishing. HarperCollins owns more than 120 branded publishing imprints, including Harper, William Morrow, HarperCollins Children's Books, Avon, Harlequin and Christian publishers Zondervan and Thomas Nelson, and publishes works by well-known authors such as Harper Lee, Chip and Joanna Gaines, David Williams, Angie Thomas, Sarah Young and Agatha Christie and popular titles such as *The Hobbit*, *Goodnight Moon*, *To Kill a Mockingbird*, *Jesus Calling* and *The Hate U Give*.
- **News Media**—The News Media segment consists primarily of News Corp Australia, News UK and the *New York Post* and includes, among other publications, *The Australian*, *The Daily Telegraph*, *Herald Sun*, *The Courier Mail* and *The Advertiser* in Australia and *The Times*, *The Sunday Times*, *The Sun* and *The Sun on Sunday* in the U.K. This segment also includes Wireless Group, operator of talkSPORT, the leading sports radio network in the U.K., and Storyful, a social media content agency. The segment included News America Marketing until the completion of the sale of the business on May 5, 2020.
- **Other**—The Other segment consists primarily of general corporate overhead expenses, the corporate Strategy Group and costs related to the U.K. Newspaper Matters.

OUR OPERATIONS

Just as our business is diverse, the activities undertaken to pursue our business objectives and strategy are diverse. In all Business Segments there is direct employment of workers, in satisfaction of relevant labor laws and regulations. In some Business Segments (e.g. Dow Jones, News Media and Book Publishing) News Corp owns and/or leases and maintains print production facilities and may engage contractors to provide related services. News Corp's businesses may involve the distribution, purchasing, marketing and sales of products through various retail, transport and other networks.

Across all Business Segments News Corp may own and/or lease commercial facilities to carry out its operations. News Corp's key operations involve the creation, provision and delivery of products (such as newspapers, books, magazines, professional information products); or services (such as video sports, entertainment, news and digital-property related services and data) to customers and clients. News Corp also makes investments in and advances to equity investments or joint ventures in which the Company has less than a controlling voting interest.

Operating around the world, News Corp strives to make a positive impact and is involved in a number of charitable activities advancing free speech, youth empowerment and innovative education. More details of such activities can be found at <https://newscorp.com/citizenship/>.

OUR SUPPLY CHAINS

Given the diverse nature of our business, the products and services (including labor) that contribute to News Corp's own products and services are sourced from third party product suppliers and service providers throughout the world and our supply chains may extend beyond direct suppliers. The following identifies where the risks of modern slavery practices may arise:

Products provided by suppliers - They vary both in terms of size and amount spent with them, but one of the key raw products that we require for our business is paper, and News Corp is one of the major purchasers of paper in the publishing sector. The Group also purchases quantities of printed material.

Other categories of third party suppliers that are used across the Group include, but are not limited to: information technology hardware; distribution and logistics; print; property and facilities; and may from time to time involve purchase of garments for discrete brand merchandising.

Services provided by suppliers - Categories of service providers that are used across the Group include, but are not limited to: advertising and marketing agents and consultants, agents (licensing and rights); financial services providers; information technology providers; professional service providers; facilities services such as cleaning contractors at most sites across the Group; transmission provider service costs (for cable, satellite and OTT).

Products and services used by indirect suppliers in News Corp's supply chains - News Corp is aware that some of its indirect suppliers are based in certain sectors in which are recognized as having higher modern slavery risk. Included in those are forestries (paper and forest products), IT hardware (electronic equipment, instruments and components); and wholesale and trade (which may include textiles, and apparel). As one of News Corp's key raw products, the supply of paper is subject to a supplier code of conduct ensuring that the paper procured for News Corp printed publications contains fiber that is verified and documented as coming from a traceable source, down to the origin forest. During FY20 we conducted a survey of our Business Units to start to better understand the detail of these products and services used by our indirect suppliers.

Please see further detail below on both the policies and due diligence processes that apply to our product suppliers and service providers that help ensure they are appropriate business partners for News Corp.

3. Risk of Modern Slavery Practices

In relation to the risks of modern slavery practices in our operations and supply chains, we have taken steps to consider how to:

- Identify and prioritize potential risk areas across our Business Units and their supply chains, such assessment based upon geography, the product or service we are being provided with and the nature of the business transaction; and
- Incorporate this issue into our existing compliance risk assessments, and compliance monitoring activities which are carried out at the various Business Units at regular intervals.

Based on these risk assessment processes, the potential for News Corp to cause, contribute to, or be directly linked to modern slavery through its operations and supply chains – that is, the risks that News Corp may be involved in modern slavery are currently as follows:

Risks that News Corp may cause modern slavery practices - There are no risks that News Corp's operations may directly result in modern slavery practices.

Risks that News Corp may contribute to modern slavery practices - No risks have been identified that News Corp's operations and/or actions in its supply chains may contribute to modern slavery. There are no identified acts or omissions undertaken at any of our Business Units that may facilitate or incentivize modern slavery.

Risks that News Corp may be directly linked to modern slavery practices - On the basis that our business relationships include all of the entities in our supply chain, including entities we do not have a direct contractual relationship with, there may be risks that News Corp's operations, products or services are connected to modern slavery through the activities of another entity. For example, at many of our premises we engage contractors to provide facilities services such as cleaning and maintenance, and there may be a risk that those contractors may use unskilled or temporary labor, an indicator of modern slavery risk. News Corp procures IT hardware that may have been manufactured by an entity using minerals sourced from a party that may have been mined by a business using forced labor. We have had no cause for concern during FY20 regarding such risks, however, during FY20 we commenced a process to review the nature of these risks by issuing a questionnaire to all of the Business Units in the Group, but will use FY21 to develop a more comprehensive process to help better understand risks beyond Tier 1. We regularly conduct Compliance Risk Councils at our businesses during which we assess whether there are any modern slavery risks and none have been identified, other than cleaning contractors and where we may have subcontracted print facilities such as in India in our book publishing business. We are not required to and do not conduct any assessment of customers who purchase our products and services. However we do make assessments of customers for other compliance risks such as corruption and sanctions, for example.

4. Actions to Address Risks of Modern Slavery

In keeping with our commitment to act with integrity in all our business dealings, we assess and address the risk of modern slavery occurring specifically by implementing relevant policies, due diligence, training, remediation and other mitigating activities developed by News Corp to assist in addressing identified risks, including:

1. Evaluating whether to issue questionnaires to high risk suppliers and service providers requesting information regarding due diligence procedures within their own supply chains;
2. Implementing action plans based on such responses, which seek to work with suppliers to resolve areas of risk and/or modify our supply relationships in order to mitigate or remove risks; and
3. Conducting site visits, where appropriate.

Details of relevant policies, due diligence, training and awareness; and remediation activities are described in further detail below:

RELEVANT POLICIES

Our existing policies, at both a global and local level, relevant to address the risks that modern slavery is not taking place in any part of our business, operations or our supply chains are as follows:

News Corp SOBC (see <https://newscorp.com/corporate-governance/standards-of-business-conduct/>)

Who does it apply to?

All News Corp directors, officers and employees must act according to the principles set forth in the News Corp SOBC, which set out the ethical conduct required of all those who work for the company, currently available in 12 different languages, including English. In addition, News Corp expects anyone working on behalf of the Company, including consultants, agents, suppliers, contractors, contributors and business partners, to adhere to the principles set forth in the News Corp SOBC.

Respect for Workers' Rights around the Globe

The News Corp SOBC was updated and distributed to every employee in the business in May 2016, May 2017, June 2018 and again in December 2019. The current version includes a specific reference to Respect for Workers' Rights Around the Globe. This section states that News Corp promotes ethical business practices and policies to protect, as far as it is able, workers from being abused and exploited, either within News Corp

itself or within its global supply chains. The News Corp SOBC also asks employees to contact appropriate representatives in their Business Unit's Human Resources or Legal Department if they have any concerns about working conditions either in their own Business Unit or in a company that provides goods or services to that Business Unit.

How to Seek Guidance and Report Concerns

The News Corp SOBC states that everyone working for or on behalf of News Corp has an obligation to report potential violations, which will include circumstances that may give rise to an enhanced risk of slavery or human trafficking. The News Corp SOBC covers how concerns should be raised, including reference to the News Corp Alertline. The Alertline is a facility through which concerns and reports can be made either by phone or through a secure website, including anonymously, subject to local laws.

Third Party Compliance Risk Management Policy

The Third Party Compliance Risk Management Policy (the **Third Party Policy**) was implemented in October 2018. This policy replaced the former Global New Vendor Add Policy that was in place, effective July 2013. Our direct product suppliers and service providers are required to be assessed, approved and entered into the relevant financial systems prior to making any payment for goods or services rendered. Further information regarding due diligence and other procedures which support this policy are discussed below.

Global Paper Sourcing Policy

The Global Paper Sourcing Policy sets out News Corp's commitment, amongst other things, to supporting local communities and the responsibility News Corp has to ensure its paper products contain wood fibre that has been responsibly managed and harvested. The policy commits News Corp to ensuring that it continues: 'to purchase 100% of the paper used on our printed publications from mills whose forest management practices are certified by an independent, internationally recognized sustainable forestry certification body such as the Forest Stewardship Council (**FSC**), Programme for the Endorsement of Forest Certification (**PEFC**), Sustainable Forest Initiative (**SFI**), Canadian Standards Association (**CSA**) or equivalent.'

The Supplier Code of Conduct set out in this Policy states that suppliers must ensure that publication paper procured by News Corp is: 'Obtained in a manner that respects the rights of workers, traditional and civil rights of indigenous peoples and rural communities.'

DUE DILIGENCE

In order to implement the Third Party Policy, News Corp requires that third parties are either registered in News Corp's due diligence management platform (the **Third Party Platform**) to ensure a consistent global standard for third party due diligence or are subject to a due diligence process of an equivalent standard, such process approved by the Global Compliance Team.

News Corp uses the Third Party Platform to obtain information on third party suppliers and rank them according to various risk factors, such as category and geographical risk, allowing News Corp to conduct risk-based due diligence.

News Corp's application of the Third Party Platform is also integrated with a risk and compliance database to screen, according to risk, third party suppliers and service providers. In addition to compliance risks, the database will also highlight whether there have been any 'adverse media reports' against the third party, including any reports relating to labor exploitation issues, slavery or human trafficking. We continue to take steps to ensure that the implementation of the Third Party Platform is as comprehensive as it can practically be across News Corp, so that key reported issues in the area of slavery and human trafficking with our direct suppliers or service providers are brought to the attention of the business and can be resolved appropriately.

This screening takes place not only when a new product supplier or service supplier is first engaged and is identified as requiring screening, but also on an ongoing basis thereafter, so that any new compliance risk, including modern slavery risk, is highlighted automatically to the business.

During FY20 News Corp began the migration to a new Third Party platform which, in addition to the current third party screening practices set forth above, incorporates a specific modern slavery due diligence process for higher risk vendor categories in order to further enhance our procedures in this area.

We have also considered how we might adapt our due diligence processes and procedures in light of the COVID-19 crisis. We have determined that, at this stage, we should not change or adapt the underlying due diligence procedures, but will continue to monitor this going forward in FY21. Moreover, we have reiterated the importance of supplier due diligence in such times, when fluctuating demand for supplier services may well lead to an increase in risk in this area.

RISK ASSESSMENT

As set out in the section above, '3. Risk of Modern Slavery Practices' we conducted, for the first time in FY20, a global modern slavery risk assessment, asking each Business Unit to respond to specific questions to identify the level of risk for their business. The assessment included general questions to identify current status of any controls, training and resources to identify and mitigate modern slavery risk; and targeted questions on activities related to 'Tier 1' suppliers that may raise modern slavery risk, with a focus on 'high risk' sectors, industries, products and services and countries. The additional actions to address risk in FY21 will be designed, in part, to address the risks identified in this assessment.

TRAINING AND AWARENESS

Reference to the importance of considering the conditions of not only our own workers, but also the workers of our third party suppliers, was communicated across News Corp in the News Corp SOBC document in May 2016, May 2017, June 2018, and in December 2019 with an accompanying SOBC training module distributed in May 2017, June 2018 and December 2019. In that training module, the News Corp General Counsel specifically raises awareness of modern slavery risks by explaining that the rights of workers need to be considered when dealing with third parties.

In addition, focused training to relevant staff, including in the relevant induction programs and as part of an ongoing compliance training program, is provided to appropriate recipients, including procurement, finance and legal teams.

In the course of FY20, a number of external law firms presented specific training on modern slavery compliance to the Global Compliance team, as well as local legal and compliance teams, covering upcoming compliance and disclosure developments and requirements on a global level.

REMIEDIATION

To date, and specifically during FY20, News Corp has not identified that it has caused or contributed to adverse modern slavery impacts. While there are some areas where News Corp may be directly linked to adverse impacts like modern slavery by an indirect business relationship, we recognize we may play a role in remediating impact. As part of our commitment to develop an enhanced understanding of our indirect suppliers during FY21 we will consider how to use our leverage to work with any relevant entities to prevent or mitigate the harm and its recurrence.

Progressively new supplier contracts at News Corp are incorporating relevant modern slavery clauses to highlight and prevent or at a minimum reduce modern slavery risks and that require compliance with modern slavery legislation. Some Business Units have or are developing policies or codes of conduct that prohibit

engaging in all forms of modern slavery or that address the risk of modern slavery. Some contracts may include warranties that the supplier will not engage in any activity, practice or conduct that would constitute an alleged offence in connection with modern slavery; and other terms that require risks of modern slavery in any part of their respective businesses or supply chain be identified and remediated as may be appropriate. We have audit rights in many of our higher risk contracts to address corruption and other risks and for new suppliers, depending on the risk profile, such audit rights may include a right to audit for compliance with relevant modern slavery obligations.

Should any modern slavery matters be identified, we have appropriate processes to enable remediation. These processes include News Corp's Alertline service, a whistle-blower hotline; 'speak up' policies embedded in the News Corp SOBC and Business Unit policies; contract clauses that contain dispute resolution provisions. These grievance mechanisms allow for people to safely raise concerns about the impact News Corp or other entities in our operations or supply chain may be having on them. Our grievance mechanisms also sit alongside other internal policies and processes that enable concerns to be identified and/or addressed. Our grievance mechanisms are confidential and protect workers' privacy, are accessible in workers' languages and available to workers outside their working hours.

OUR EFFECTIVENESS IN COMBATING MODERN SLAVERY

In assessing our effectiveness in combating modern slavery, we have established Key Performance Indicators (**KPIs**) and will, where possible, measure our performance against them against the following year. We intend to build upon these KPIs year on year, as we build upon the steps we take in this area. The KPIs established for FY2019 and measured again in FY2020 included:

- Reviewing the number of employees who have received the News Corp SOBC online training module;
- Reviewing the number of individuals in the business who have received additional face to face training on modern slavery; and
- Reviewing the number of third parties which have been targeted for further due diligence processes through our new Third Party Platform.

In addition, our Global Compliance team will be improving the process by which we are tracking the enhanced actions we have started to take during FY20, and will continue taking during FY21, to assess and address modern slavery risks as set out in this statement. In particular, there is work we will need to do to further understand indirect suppliers to our 'Tier 1' suppliers that may raise modern slavery risk, with a focus on 'high risk' sectors, industries, products and services and countries.

FURTHER STEPS

We will periodically review the effectiveness of the steps we are taking to ensure the risks of modern slavery in our business, operations or our supply chains are addressed. Our aim is to continually monitor and, where necessary, improve any policies, procedures and systems that we have already implemented.