



*News Corp*

# Modern Slavery Statement for Fiscal Year 2022

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## Statement from Chief Executive Officer

News Corp recognizes the importance of combating modern slavery, a crime that affects individuals and communities across the globe.

We welcome efforts being taken by the public, private and non-profit sectors to eradicate the scourge of slavery. As a company committed to sound environmental, social and governance practices, we promote ethical business practices and policies throughout our businesses, and ensure that our robust Standards of Business Conduct are understood and valued by all who work at News Corp.

We are determined that no person's freedom is denied anywhere in the operations of our businesses or our supply chains.

A handwritten signature in black ink that reads "Robert Thomson".

**Robert Thomson**  
Chief Executive  
15 November, 2022

The News Corp logo, featuring the words "News Corp" in a white, cursive script font, centered on a solid blue rectangular background.

### About This Statement

References to News Corporation (the "Company", "News Corp", "we", "us" or "our") in this statement means News Corporation and its subsidiaries. News Corp principally consists of the entities listed in Exhibit 21.1 of News Corporation's Form [10-K Annual Report](#).

This statement sets out the steps taken across News Corp to address the risks of modern slavery in our business, operations or supply chains from 1 July 2021 to 30 June 2022. It should be read in conjunction with [News Corp's 2022 Environmental, Social and Governance Report](#). This statement is published in accordance with the U.K. Modern Slavery Act 2015 and the Australian Modern Slavery Act 2018 as a joint statement, inclusive of the relevant subsidiaries of News Corp to which these Acts apply, and adopts the definitions of modern slavery in those acts.

In Australia the relevant reporting entities are: News Corp Australia Pty Limited and its relevant subsidiaries Nationwide News Pty Ltd, Advertiser Newspapers Pty Limited, The Herald and Weekly Times Pty Limited, NewsLifeMedia Pty Limited and Queensland Newspapers Pty Limited; NXE Australia Pty Limited, more commonly referred to as the Foxtel Group; News Pay TV Financing Pty Limited; and News Australia Holdings Pty Limited.

The REA Group publishes its own separate modern slavery statement.

# Overview of News Corp

**News Corporation** (Nasdaq: NWS, NSWA; ASX: NWS, NWSLV) 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.

News Corp comprises businesses across a range of media, including digital real estate services, subscription video services in Australia, news and information services and book publishing. Headquartered in New York, News Corp operates primarily in the United States, Australia and the United Kingdom, and our content and other products and services are distributed and consumed worldwide.

We structure our businesses in the following business segments:



**Digital Real Estate Services** – This segment consists of the Company’s interest in the REA Group, a publicly-traded (ASX:REA) market-leading digital media business specializing in property, and Move, a leading provider of digital real estate services in the U.S. Its most recognizable brands include realestate.com.au and realtor.com\*.



**Subscription Video Services** – The Company provides video sports, entertainment and news services to pay-TV and streaming subscribers and other commercial licensees, primarily via cable, satellite and internet distribution, through our interest in the Foxtel Group and Australian News Channel.



DOW JONES

**Dow Jones** – The Dow Jones segment is a global provider of news and business information, which distributes its content and data through a variety of media channels including newspapers, newswires, websites, mobile apps, newsletters, magazines, proprietary databases, live journalism, video and podcasts. The Dow Jones business’ products include *The Wall Street Journal*, *Barron’s*, MarketWatch, Factiva, Dow Jones Risk & Compliance, Dow Jones Newswires, and OPIS pricing news and analytics services as well as Chemical Markets Analytics and Business Advisory Services. Dow Jones also operates *Investor’s Business Daily*.



**Book Publishing** – HarperCollins Publishers is the second largest consumer book publisher in the world based on global revenue, with operations in 17 countries. HarperCollins publishes and distributes consumer books globally through print, digital and audio formats.

News Corp Australia

News UK



**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. The segment also includes Wireless Group, operator of talkSPORT, the leading sports radio network in the U.K., Virgin Radio, the Company’s recently launched TalkTV, and Storyful, a news and intelligence agency.

# Risk of Modern Slavery in Our Operations & Supply Chain

## OUR OPERATIONS

As of June 30, 2022, the Company had approximately 25,500 employees, of whom approximately 9,000 were located in the U.S., 5,500 were located in the U.K., and 8,000 were located in Australia.

# 25,500

EMPLOYEES

News Corp's direct workforce primarily consists of highly skilled employees based mainly in office facilities, creating and delivering products (such as newspapers, books, magazines and professional information products) or services (such as video, sports, entertainment, news and digital real estate related services and data). In some business segments (e.g., Dow Jones and News Media), News Corp operates print production facilities. The operations of these business segments may also involve the sale and distribution of printed products through various retail, transport, and other networks.



## RISK OF MODERN SLAVERY IN OUR OPERATIONS

Our employees are predominantly full-time employees who are employed in accordance with local labor laws and paid fairly at market rates. Of the Company's employees, approximately 4,000 were represented by various employee unions. Consequently, the risk that News Corp causes or contributes to modern slavery practices in its operations is low. There are isolated examples of operations in jurisdictions where labor exploitation risks are higher, for example in the Pacific nation of Papua New Guinea.



The Papua New Guinea Post Courier<sup>[1]</sup> has been PNG's most trusted newspaper since 1969 and is referred to as "the voice of PNG".

Operating in a country with a high vulnerability to modern slavery<sup>[2]</sup> and other human rights abuses, the company is committed to the safety and welfare of its staff who produce, print, and distribute its publications.

Getting home safely from a shift is a serious concern so the company provides transportation and, for over 30% of workers, accommodation. The company provides a medical center with nursing staff on site, as well as support for workers' families and communities to navigate challenges including ill health, and impoverishment.

<sup>[1]</sup> News Corp ultimately holds a 62.51% shareholding in South Pacific Post Limited, the publisher of the Post-Courier.

<sup>[2]</sup> See <https://www.globallslaveryindex.org/2018/data/country-data/papua-new-guinea/>





## OUR SUPPLY CHAIN

**Products** – A key raw product that we require for our business is paper, and News Corp is one of the major purchasers of paper in the publishing sector. News Corp also purchases quantities of printed material.

Other major categories of products purchased across the Company include printing and ink, media/broadcast and technology, both typical workplace software and hardware, as well as technology for the production and distribution of our information services and subscription video content (e.g., cameras, editing software, set top boxes, and peripherals).

From time to time Business Units may purchase garments or other items for discrete promotions or brand merchandising.

**Services** – Business services, including marketing, professional services, finance and legal, temporary labor, and human resources, is the group's largest category of spend with third party service providers. Other categories of services provided by third parties include: printing; transportation and distribution; real estate and facilities services such as cleaning and maintenance; transmission services (for cable, satellite and OTT); and installation of subscription video services.

**Extended supply chain for products and services** – News Corp is aware that some of its indirect suppliers are based in certain sectors that are recognized as having higher modern slavery risk. Included in those are forestries (paper and forest products), information technology hardware (electronic equipment, instruments, and components); and wholesale and trade (which may include textiles and apparel).

## RISK OF MODERN SLAVERY IN OUR SUPPLY CHAIN

News Corp's risk assessments point to the following areas that carry a heightened risk of modern slavery practices in our direct or extended supply chain:

- PRINTING SERVICES
- PAPER
- PRINTING MATERIALS
- INFORMATION AND COMMUNICATIONS TECHNOLOGY
- MERCHANDISE
- TRANSPORTATION
- CLEANING, MAINTENANCE, AND PHYSICAL SECURITY
- CONSTRUCTION
- OFFSHORE SERVICE CENTRES

News Corp has no evidence to suggest that modern slavery practices are occurring in any of its supply chains. News Corp continues to assess and manage higher risk industries and geographic areas where it could be linked to modern slavery practices to minimize and prevent instances of slavery and human trafficking in any of its direct or extended supply chains.

# Actions to Address Risks of Modern Slavery

## RELEVANT POLICIES

News Corp has a detailed governance and policy framework which mitigates the risk of modern slavery practices within our operations and supply chains. This includes:

### News Corp Standards of Business Conduct<sup>[3]</sup>

The Standards of Business Conduct (SOBC) sets out the ethical conduct required of directors, officers and employees, and expected of anyone working on behalf of News Corp, including consultants, agents, suppliers, contractors, contributors, and business partners.

It 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, and asks employees to contact appropriate representatives if they have any concerns about working conditions either in their own Business Unit or in an organization that provides goods or services to that Business Unit.

### Seeking Guidance & Reporting Concerns

The 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, and details how to raise concerns.

### Third Party Compliance Risk Management Policy

The Third Party Compliance Risk Management Policy (**Third Party Policy**) requires our direct product suppliers and service providers to be assessed, approved and properly recorded 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

Through our Global Paper Sourcing Policy,<sup>[4]</sup> we seek to work with paper suppliers that share our commitment to responsible sourcing. Our commitments include:

- Ensuring that paper contains fiber that is obtained in a manner that respects the rights of workers, traditional and civil rights of indigenous peoples, and rural communities.
- Continuing to purchase 100% of paper used in our printed publications from mills whose forest management practices are certified by an independent, internationally recognized forestry certification body such as the Forest Stewardship Council (FSC) or Programme for the Endorsement of Forest Certification (PEFC), amongst others. The certification standards of these bodies are aligned with the UN International Labour Organization's Core Conventions addressing slavery and other forms of forced or involuntary labor.



A News UK subsidiary, Newsprinters, handles printing and logistics for News UK titles and those of third party clients including The Daily Mail, Mail on Sunday, The Telegraph, the Sunday Telegraph, and The Financial Times.

Although Newsprinters operates in a low risk modern slavery sector, News UK remains vigilant for signs of modern slavery in its supply chain. News UK takes steps to ensure modern slavery remains front of mind at Newsprinters by hosting an annual training on modern slavery for its production and logistics teams and distributing awareness posters at its manufacturing sites and to its delivery drivers. Training is provided in person and in small groups to those most likely to encounter victims of modern slavery (e.g., night managers and heads of logistics) and by way of recording (e.g., for those working remotely) to ensure that it is targeted and effective.

Both the training and the awareness campaign identify examples of behaviors that could be indicative of modern slavery, and highlight the various reporting channels through which employees can report concerns, including through the Alertline.

<sup>[3]</sup> See <https://newscorp.com/corporate-governance/standards-of-business-conduct/>.

<sup>[4]</sup> See <https://newscorp.com/wp-content/uploads/2020/11/Global-Paper-Sourcing-Policy-October-2020.pdf>.



## SUPPLIER DUE DILIGENCE

News Corp requires that its suppliers are either registered in News Corp's due diligence management platform (**Third Party Platform**) provided by Dow Jones, or are subject to a due diligence process of a similar standard. Suppliers are ranked according to various risk factors, including industry and geographical risk, allowing News Corp to conduct risk-based, proportionate due diligence. The Third Party Platform enables enhanced due diligence questionnaires on modern slavery to be issued to suppliers identified as higher risk.

News Corp Business Units also use the Third Party Platform, or similar, to identify any 'adverse media reports' about the supplier, including any reports relating to labor exploitation issues, slavery or human trafficking. 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, including through enhanced modern slavery contractual provisions or alternative supplier selection.

## RISK ASSESSMENT

Risk assessments are a core element of News Corp's group-wide compliance program. Modern slavery and other issues that relate to third party risk management, such as anti-bribery and sanctions, form part of that program of risk assessment. News Corp is working continuously with its Business Units to identify priority operations and suppliers for modern slavery risk mitigation, based largely on the geographic risk (through the Global Slavery Index<sup>[5]</sup>) and the risks posed by the particular product or service provided. Using the outcomes of risk assessments, we have been:

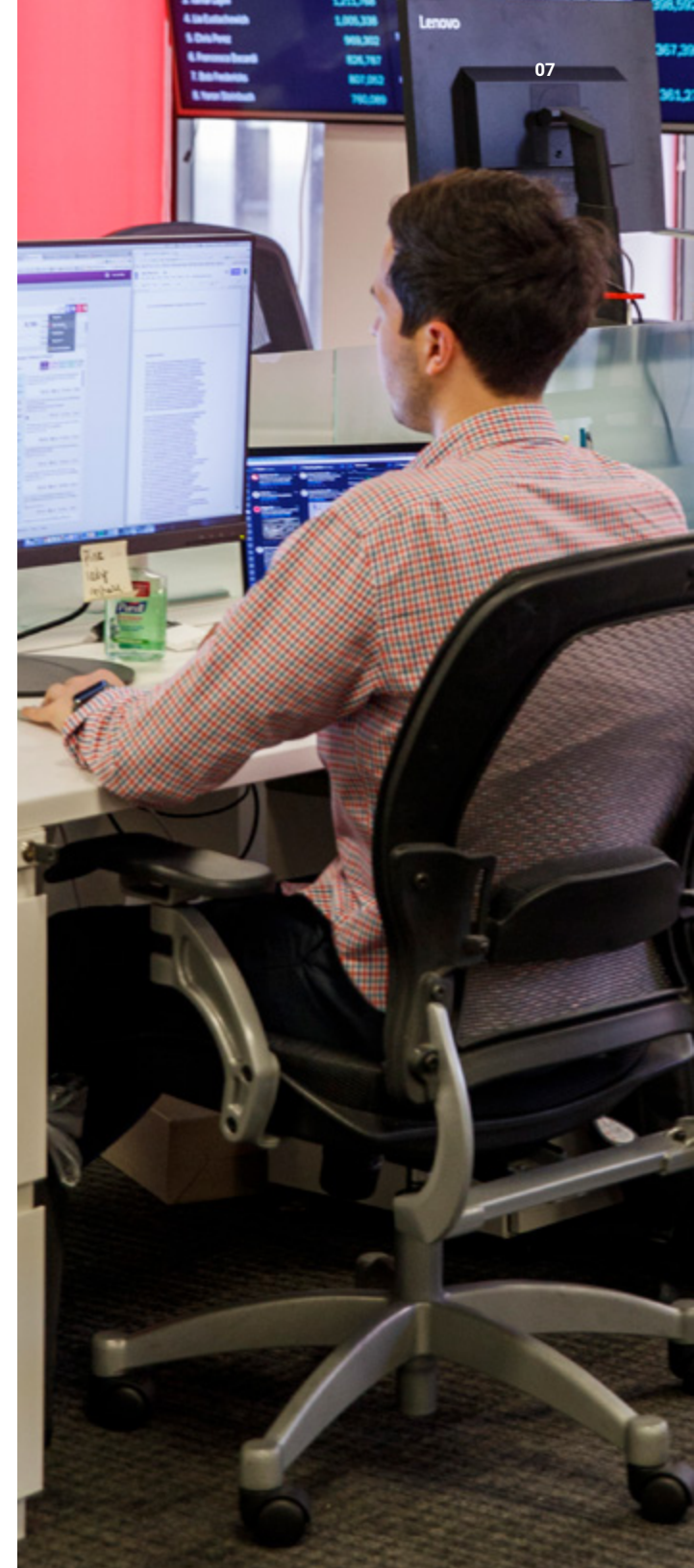
- Enhancing requirements in tenders or requests for proposal
- Issuing questionnaires to our highest risk suppliers
- Implementing action plans based on responses received
- Enhancing contractual provisions
- Conducting site visits, where appropriate, or enhancing remote oversight<sup>[6]</sup>

## TRAINING & AWARENESS

The importance of considering the conditions of both our own workers and those of our suppliers has been communicated in the News Corp SOBC since May 2016, with an accompanying SOBC training module available to all new staff and regularly refreshed to existing staff. In that training module, the News Corp General Counsel and Chief Compliance Officer specifically raises awareness of modern slavery risks by explaining that the rights of workers need to be considered when dealing with third parties. In FY22, News Corp conducted various training sessions specifically focused on modern slavery risks for appropriate recipients at its Business Units, including procurement and legal teams, and staff who visit higher risk supplier sites or work in proximity to potentially vulnerable workers.

<sup>[5]</sup> See <https://www.globalslaveryindex.org>.

<sup>[6]</sup> The COVID-19 pandemic had limited opportunities for site visits during most of FY22.





## REMEDIATION

Prior to and during FY22, News Corp has not identified that it has caused or contributed to adverse modern slavery outcomes. In FY22, News Corp learned that one of its suppliers, a printing service widely used in the publishing sector, had engaged a subcontractor that was later identified as being involved in modern slavery. News Corp took immediate steps to address and remedy the risk that modern slavery practices could be occurring in its business or supply chains. Following the incident, News Corp promptly engaged a human rights advisory firm to conduct due diligence on the supplier in question, specifically assessing policies and practices related to working conditions to assess the supplier's capacity to prevent and mitigate modern slavery risks.

Progressively, new supplier contracts at News Corp are incorporating clauses to address modern slavery risks and require compliance with modern slavery legislation. We appreciate the importance of avoiding harm to victims and understand the need, at times, to work with suppliers to improve labor conditions, rather than terminating the relationship altogether. We maintain a relationship with a human rights advisory firm with experts available globally to assist should an issue arise.

We encourage staff and third parties to raise any concerns about modern slavery through News Corp's 'speak up' policies that are embedded in the SOBC and Business Unit policies. News Corp has an arrangement with a third party to operate a whistle-blower helpline service we call Alertline. Reports can be made in most languages, 24 hours a day, every day of the year. Anonymity is available (to the extent permitted by applicable laws), and workers' privacy is protected. No one who in good faith<sup>[7]</sup> reports any suspected problem or wrongdoing will suffer retaliation or adverse employment consequences for having made such a report.

## EFFECTIVENESS

In assessing our effectiveness in combating modern slavery, we have established Key Performance Indicators (KPIs) and will, where possible, measure our performance against them year on year as we seek to enhance the steps we take in these areas. The KPIs established in FY19 and measured each year through to FY22 included:

- Reviewing the number of employees who have received the News Corp SOBC online training module;
- Reviewing the number of individuals who have received additional face to face training on modern slavery; and

- Reviewing the number of third parties targeted for further modern slavery due diligence.

## 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.

## CONSULTATION & APPROVAL PROCESS

Each News Corp Business Unit has been consulted as part of the preparation of this statement, including providing information about the actions taken to address modern slavery in its business.

The board of directors of News Corporation<sup>[8]</sup> and each of the subsidiaries of News Corp that could be considered reporting entities in their own right, have, at properly convened board meetings, viewed a copy of this statement, where relevant approved it, and in the case of News Corporation, delegated authority to the Chief Executive, News Corp to sign it.

<sup>[7]</sup> or in accordance with the relevant business unit policy.

<sup>[8]</sup> The board of directors of News Corporation approved this statement in a duly convened board meeting on 15 November, 2022



*News Corp*