

Slavery And Human Trafficking Statement For Financial Year 2018

- This statement sets out the steps that we, News Corp, have taken across the News Corp Group¹ to ensure that slavery or human trafficking is not taking place in any part of our own business or supply chains. This statement relates to actions and activities during the financial year 2018, 1 July 2017 to 30 June 2018.

STATEMENT FROM CHIEF EXECUTIVE OFFICER

News Corp recognizes the importance of combating slavery and human trafficking, 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. As such, we are totally opposed to such abuses of a person's freedoms both 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 <http://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 slavery and human trafficking have no place either in our own business or our supply chains.



Robert Thomson
CEO, News Corp
8 August, 2018

MEANING OF SLAVERY AND HUMAN TRAFFICKING

For the purposes of this statement, slavery and human trafficking is based on the definitions set out in the Modern Slavery Act 2015 (the **Act**). We recognize that slavery and human trafficking can occur in many forms, such as forced labor, child labor, domestic servitude, sex 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.

OUR BUSINESS

News Corp (together with its subsidiaries, **News Corp**, the **Group**, the **Company**, **we** or **us**) is a global diversified media and information services company comprised of businesses across a range of media, including: news and information services, book publishing, digital real estate services and subscription video services in Australia. The Group manages and reports its businesses in the following five segments:

¹ News Corp is a global diversified media and information services company principally consisting of the entities listed on page 189 of News Corp's 2018 Annual Report (<https://newscorp.com.files.wordpress.com/2018/09/news-corp-2018-annual-report.pdf>)

News and Information Services – The News and Information Services segment includes the Company's global print, digital and broadcast radio media platforms. These product offerings include the global print and digital versions of *The Wall Street Journal* and the *Dow Jones Media Group*, which includes *Barron's* and MarketWatch, the Company's suite of professional information products, including Factiva, Dow Jones Risk & Compliance, Dow Jones Newswires and DJX and its live journalism events. The Company also owns, among other publications, *The Australian*, *The Daily Telegraph*, *Herald Sun*, *The Courier Mail* and *The Advertiser* in Australia, *The Times*, *The Sunday Times*, *The Sun* and *The Sun on Sunday* in the U.K. and the *New York Post* in the U.S. This segment also includes News America Marketing, a leading provider of home-delivered shopper media, in-store marketing products and services and digital marketing solutions, including Checkout 51's mobile application, as well as Unruly, a global video advertising marketplace, Wireless Group, operator of talkSPORT, the leading sports radio network in the U.K., and Storyful, a social media content agency.

Book Publishing — The Book Publishing segment consists of HarperCollins, the second largest consumer book publisher in the world, with operations in 18 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, Patricia Cornwell, Chip and Joanna Gaines, Rick Warren, Sarah Young and Agatha Christie and popular titles such as *The Hobbit*, *Goodnight Moon*, *To Kill a Mockingbird*, *Jesus Calling* and *Hillbilly Elegy*.

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 Australian Securities Exchange (**ASX**) (ASX: REA). REA Group advertises property and property-related services on its websites and mobile applications across Australia and Asia, including Australia's leading residential and commercial property websites, realestate.com.au and realcommercial.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 online 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 for Buyers and AdvantageSM Pro products. Move also offers a number of professional software and services products, including Top Producer®, FiveStreet® 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 Protocol, or IP, distribution, and consists of (i) its 65% interest in new Foxtel and (ii) Australian News Channel Pty Ltd (**ANC**). The remaining 35% interest in new Foxtel is held by Telstra, an ASX-listed telecommunications company. New Foxtel is the largest pay-TV provider in Australia, with over 200 channels covering sports, general entertainment, movies, documentaries, music, children's programming and news and broadcast rights to live sporting events in Australia including: National Rugby League, Australian Football League, Cricket Australia, the domestic football league, the Australian Rugby Union and various motorsports programming.

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 mobile, podcasts and social media websites.

Other — The Other segment consists primarily of general corporate overhead expenses, the corporate Strategy Group and costs related to the U.K. Newspaper Matters, as further defined in News Corp's Annual Report. The Company's Strategy Group identifies new products and services across its businesses to increase revenues and profitability and targets and assesses potential acquisitions, investments and dispositions.

Headquartered in New York, the Group operates primarily in the United States, Australia and the U.K. and its content is distributed and consumed worldwide. It employs approximately 28,000 employees globally and operates globally.

For the fiscal year ended June 30, 2017, News Corp reported total global revenue of \$8.14 billion. For the fiscal year ended June 30, 2018, News Corp reported total global revenue of \$9.02 billion.

OUR SUPPLY CHAINS

Given the diverse nature of our business, we have third party product suppliers and service providers throughout the world who supply goods and services to the Group for the various different business segments listed above. 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.

Other categories of third party suppliers and 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; distribution and logistics; print; property and facilities.

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

RELEVANT POLICIES

In keeping with our commitment to act with integrity in all our business dealings, our existing policies, at both a global and local level, are relevant to ensure that there is no slavery or human trafficking in any part of our business or our supply chains. Set out below are three global policies of key relevance:

News Corp SOBC (see <http://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 13 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 were updated and distributed to every employee in the business in May 2016, redistributed in May 2017 and again in June 2018. The updated 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.

Global New Vendor Add Policy

Following the introduction of the Global New Vendor Add Policy (effective July 2013 and, from Autumn 2018, superseded by the Third Party Compliance Risk Management Policy) (the **Third Party Policy**), implemented across News Corp as part of an enhanced global compliance programme, 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 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 are currently taking 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 is highlighted automatically to the business.

RISK ASSESSMENT

The risk of slavery and human trafficking within our own organization is substantially avoided and mitigated as a result of strict policies and procedures as well as the oversight built into our business operations and the knowledge and skills of our employees.

In relation to the risk of slavery and human trafficking within any of our supply chains, we have taken steps to consider how to:

- Identify and prioritise 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;
- Incorporate this issue into our existing compliance risk assessments, which are carried out at the various Business Units at regular intervals;
- Mitigate the risk of slavery and human trafficking occurring in the high risk areas identified, more specifically by:
 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.

We will continue to build upon the risk assessment processes set out above and their findings in FY2019.

RESPONSIBILITY FOR COMPLIANCE WITH OUR STATED VALUES AND STANDARDS

The Global Compliance team, assisted by Corporate Audit and local legal, compliance, human resources, finance and procurement teams, will, going forward from the date of this statement, coordinate and be responsible for all necessary activities to monitor the relevant News Corp companies' compliance with the values and standards as set out in this statement.

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 and June 2018, with an accompanying SOBC training module distributed in May 2017 and June 2018, in which the News Corp General Counsel specifically raised 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 programmes and as part of an ongoing compliance training programme, is provided to appropriate recipients, including procurement, finance and legal teams.

OUR EFFECTIVENESS IN COMBATING SLAVERY AND HUMAN TRAFFICKING

In assessing our effectiveness in combating slavery and human trafficking, 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 FY 2018 and FY2019 include:

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

FURTHER STEPS

We will periodically review the effectiveness of the steps we are taking to ensure there is no slavery or human trafficking in our supply chains. Our aim is to continually monitor and, where necessary, improve any policies, procedures and systems that we have already implemented.

This statement is made pursuant to section 54(1) of the Act and constitutes the slavery and human trafficking statement for the financial year ending 2018 for News Corp, inclusive of the relevant subsidiaries of News Corp to which the Act applies.

The board of directors of the Company² and each of the relevant subsidiaries of News Corp have, at properly convened board meetings, viewed a copy of this statement, approved it and delegated authority to sign it on their behalf to the CEO of the Group.

² The board of directors of the Company approved this statement in a duly convened board meeting on 8 August, 2018.